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WILDERNESS RECOMMENDATIONS

ARCATA RESOURCE AREA

RED MOUNTAIN WSA

FINAL ENVIRONMENTAL
IMPACT STATEMENT

1988

U.S. DEPARTMENT
OF THE INTERIOR

BUREAU OF LAND
MANAGEMENT
CALIFORNIA

IN REPLY REFER TO:

1792
(CA-930)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

Dear Reader:

Enclosed is the final Environmental Impact Statement (EIS) prepared for the Red Mountain Wilderness Study Area in the Arcata Resource Area of the Ukiah District. The EIS analyzes the impact of adding 6,173 acres to the National Wilderness Preservation System. A No Wilderness Alternative is also considered. The statement was prepared pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969 and responds to the mandates of Sections 202, 203 and 603 of the Federal Land Policy and Management Act of 1976 to review public lands and report on the suitability of these lands for wilderness designation and consider through the planning process additional areas that may be suitable.

Comments on this document can be sent to me at the above address. They will be considered in the Wilderness Study Report (WSR) which will constitute my final recommendation to the Secretary of the Interior. The Secretary will forward his recommendation to the President not later than October 21, 1991.

For further information please contact: District Manager, Bureau of Land Management, 555 Leslie Street, Ukiah, California 95482.

Sincerely yours,

Ed Hastey

Ed Hastey
State Director

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DEPARTMENT OF THE INTERIOR

FINAL ENVIRONMENTAL IMPACT STATEMENT

WILDERNESS RECOMMENDATIONS

FOR THE

ARCATA RESOURCE AREA

RED MOUNTAIN WSA
(CA-050-132)

Prepared by

BUREAU OF LAND MANAGEMENT

UKIAH DISTRICT OFFICE, CALIFORNIA

Ed Hastey
State Director, California

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ENVIRONMENTAL IMPACT STATEMENT ON THE
WILDERNESS RECOMMENDATIONS
FOR THE RED MOUNTAIN WSA

Draft ( ) Final (X) Environmental Impact Statement

1. Type of Action: Administrative ( ) Legislative (X)

2. Abstract:

The Bureau of Land Management has analyzed the impacts and resource tradeoffs of a proposal to not designate the Red Mountain Wilderness Study Area (WSA) as wilderness. This WSA is in Mendocino County, California. It is part of BLM's Arcata Resource Area in the Ukiah District. This environmental impact statement also analyzes the impacts and tradeoffs of an All Wilderness Alternative. Wilderness characteristics and special features are examined.

SUMMARY

This environmental impact statement assesses the environmental consequences of designating and not designating the Red Mountain Wilderness Study Area and certain adjacent lands as wilderness.

The Red Mountain WSA contains 6,173 acres of public land in the Coast Range in northern Mendocino County, California. San Francisco is a four to five hour drive to the south and Eureka is two hours to the north. The terrain is generally steep and the vegetative cover ranges from an open pine forest on unusual red soils to dense brush and barren areas.

Major resource issues relevant to land-use planning for the area involve an important nickel/cobalt/chromium deposit, endangered plants, unusual soils, an anadromous fishery, and important watershed resources.

This EIS analyzes a Proposed Action of continuation of the present management plan including management of the area as an Area of Critical Environmental Concern (ACEC) and a Research Natural Area (RNA) plus an All Wilderness Alternative.

A summary of the environmental consequences is contained in Table 1, page 2-9.

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Chapter 1

Introduction

CHAPTER 1

INTRODUCTION

This Environmental Impact Statement (EIS) analyses the possible consequences of wilderness designation and nondesignation for the Red Mountain Wilderness Study Area (WSAs) in the Arcata Resource Area in the Bureau of Land Management's Ukiah District, California. The analysis evolves from a requirement included by Congress in Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) directing the Secretary of the Interior and the Bureau of Land Management (BLM) to review roadless areas of 5,000 acres or more having wilderness characteristics and by 1991 to recommend to the President the suitability of such areas for preservation as wilderness. Under Sections 202 and 203 of FLPMA, BLM can, through its planning system, recommend additional lands for wilderness designation. In determining wilderness values, the law directs the Bureau to use the criteria given by Congress in the Wilderness Act of 1964. In Section 2(c) of the Act, Congress states that "wilderness is essentially an area of undeveloped Federal land in a natural condition, without permanent improvements or human habitation, which has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value."

LOCATION

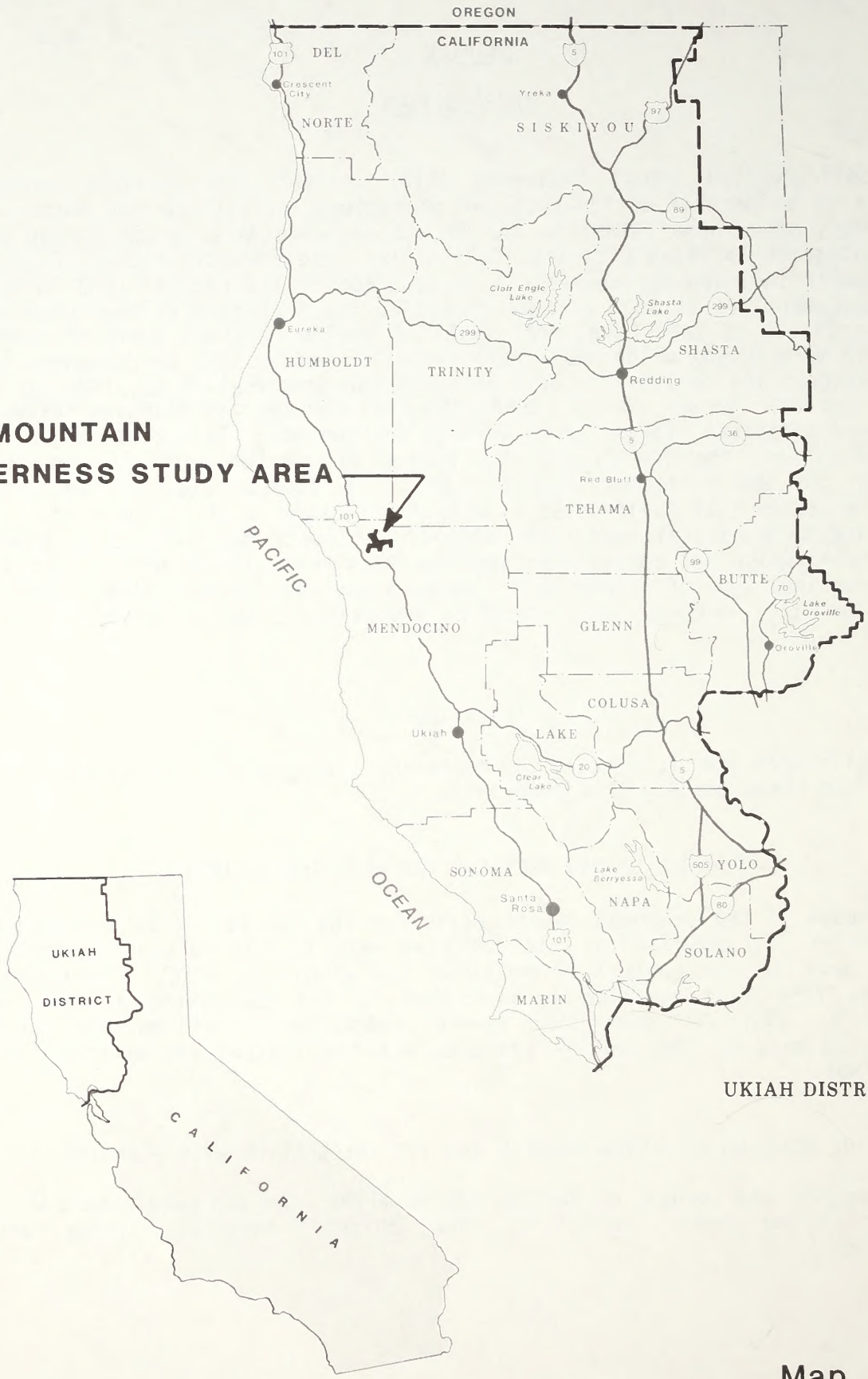
This 6,173-acre WSA is located in Mendocino County about 175 miles north of the San Francisco Bay Area (Map 1-1).

PURPOSE OF AND NEED FOR THE PROPOSED ACTIONS

The purpose of the proposal (which calls for the WSA to not be designated wilderness) is, nevertheless, to preserve many of the natural amenities of the area in the context of multiple use within an ACEC. The method by which this will be done is described by the management actions in Chapter 2. This will contribute toward productive use of the land while preserving many of the special features and the limited recreational use of the WSA.

THE WILDERNESS REVIEW PROCESS AND ITS INTEGRATION WITH PLANNING

To accomplish the mandate of Section 603 of FLPMA, the BLM developed a wilderness review process containing three phases: inventory, study, and reporting.



RED MOUNTAIN WILDERNESS STUDY AREA

UKIAH DISTRICT

Map 1-1
Location Map

The inventory phase of this process, initiated in 1978, involved examining the public lands to determine and locate the existence of areas containing wilderness characteristics that met the criteria established in the Wilderness Act. Areas clearly lacking wilderness characteristics were sorted out from lands that might have those characteristics. This intensive inventory was then followed by a 90-day public review period, after which final WSAs were identified.

This inventory process and a general description of all of California's WSAs are given in Wilderness: Final Intensive Inventory, Public Lands Administered by BLM California Outside the California Desert Conservation Area (1979). A copy of this publication is available at any BLM office.

The second step in the review process was to integrate wilderness evaluation into the BLM Planning System (43 CFR 1600). Decisions coming from the FEIS will be incorporated as part of the Arcata Resource Area's Resource Management Plan (RMP). The wilderness study criteria and quality standards contained in the BLM's Wilderness Study Policy: Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands (47 FR 5098-5122) were applied to each WSA.

In addition to the above referenced criteria and standards, issues for discussion were identified through public comment and internal scoping, conflicts were analyzed, and alternatives were developed. See page 1-7 for a discussion of which alternatives were selected and why. These alternatives are the basis for analysis of environmental consequences and resource tradeoffs.

Following public review of the draft environmental impact statement, the Ukiah District, with State Director concurrence, prepared a final environmental impact statement and wilderness study report. These were reviewed by the BLM Director and the Secretary of the Interior, who filed this final EIS and who will make a recommendation to the President. The President has up to two years to make his final recommendation to Congress, which has sole authority to designate an area as wilderness. Until Congress decides whether or not to designate an area as wilderness, the WSAs will be managed in accordance with the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review (Department of the Interior, December 1979).

SCOPING

The Council on Environmental Quality Regulations Implementing the National Environmental Policy Act (40 CFR, Part 1501.7) and the BLM planning regulations (43 CFR 1610.4-1) require an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. During this process, the scope and importance of issues related to the proposed action and alternatives were identified. Information obtained during the scoping process was one of the sources used to determine which impact topics would be addressed in detail in this EIS. Additional purposes of the scoping process are to inform affected Federal, state, and local agencies and other interested

parties about the proposed project, and to identify existing environmental reports and information related to the impact assessment.

The scoping process involved discussions with the public and resource specialists and managers of BLM and other relevant agencies. Written comments were received and compiled as a result of Federal Register announcements, news releases, mailings, and articles about the proposal. Comments were also solicited during public meetings. In addition, the initial scoping effort has been followed by an effort to continue agency and public involvement throughout the development of this EIS. Comments on the draft EIS (see Table 5-1, page 5-10) were carefully considered in the selection of issues for the final EIS. This section outlines the steps taken by BLM in the scoping and public involvement process for the EIS.

SCOPING PROCESS

* Red Mountain Management Framework Plan - 1976.

* Initial wilderness inventory and public comment period - 1978-1979.

* Intensive wilderness inventory and public comment period - 1979-1980.

* BLM study and planning process - 1980-1986.

* A Notice of Intent to prepare a revision of the Red Mountain Management Framework Plan and the environmental impact statement for the wilderness study area was published in the Federal Register on December 9, 1982.

* A scoping letter was mailed on December 30, 1982, to about 500 organizations, agencies, and individuals on the Ukiah District's mailing list that had indicated an interest in wilderness. This letter explained the planning process and asked for identification of issues for the Red Mountain Wilderness Study Area. Responses to the scoping letter were received from 275 people and organizations. Most of the letters were general pleas for or against wilderness, but some did identify issues specific to Red Mountain.

* In September 1983 the draft EIS was mailed to 262 individuals and organizations. Comments received were used to refine the issues analyzed in this document.

ISSUES SELECTED FOR ANALYSIS

Impacts on Wilderness Values

The wilderness values of naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSA not be designated wilderness.

Impacts on the Endangered Plant, Arabis mcdonaldiana, and Three "Candidate Plant Species" for Federal Listing

Arabis mcdonaldiana is one of only six federally listed species on BLM land in California. Most experts believe that the only place it occurs is in the Red Mountain Area. It could be impacted by any activity that disturbs the soils on which it depends. Red Mountain stonecrop, Kellogg's buckwheat, and Red Mountain catchfly are being considered by the Fish and Wildlife Service for listing as threatened or endangered. It is BLM policy to give each "candidate species" the same protection as listed species. They could be impacted by any activity that disturbs the soils on which they depend.

Impacts on Unique Vegetation Communities

Unique vegetation communities in the Red Mountain area include: old growth Douglas fir, Sargent cypress, McNab cypress, and two bogs. These communities could be impacted by some of the management actions.

Impacts on the Steelhead Fishery in Cedar Creek

Cedar Creek is a significant steelhead spawning and fish rearing tributary of the South Fork of the Eel River. It is also used by both king and silver salmon. There is public concern that possible siltation and toxic waste from mining and other activities would reduce its productivity.

Impacts on Drinking Water Supplies

Several hundred people live around the base of Red Mountain and almost all of these households get their water from springs or direct diversions from creeks that flow off Red Mountain. There is concern that future actions will impact these water supplies.

Impacts on Unique Soils

The 3,635 acres of red soils in the WSA are very rare and of considerable scientific interest because of their similarity to tropical soils. Any impacts on them could adversely affect the unique vegetation of the area.

Impacts on Mining

Three strategic minerals considered vital to the security of the nation (nickel, cobalt, and chromium) occur in near commercial quantities within the WSA. Changing technology, an increasing demand for and price of these minerals could make mining feasible. However, it is BLM's judgment that, because of the provisions of the Endangered Species Act relative to endangered and sensitive plants within the WSA, significant mining activity will not take place within the WSA (see the Appendix). Nevertheless, because of public concern regarding mining in this area and because activities related to mining could be affected by wilderness designation or nondesignation, "Impacts on Mining" has been selected for analysis in this document.

Impacts on the Endangered Peregrine Falcon

The WSA includes an important part of the feeding territory of the peregrine falcon. The usefulness of this territory to the peregrines could be impacted by some of the management actions.

Impacts on Available Wildlife Habitat

A number of important wildlife species occur in the WSA including river otter, black bear, mountain lion, and golden eagle. The quality of the habitat available for these species could be affected by some of the management actions.

ISSUES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

Impacts on the Endangered Bald Eagle

Bald eagles use the area periodically but primarily in winter. Use of the area does not appear to be critical to the eagles, merely incidental. In the unlikely event that their use were displaced by any of the management actions, it would not affect eagle populations, thus this issue was dropped from further analysis.

Impacts on Timber Management

Several individuals expressed concern about possible logging in the WSA. However, the amount of timber is small (about 18 MMBF on 900 acres outside of the old growth reserve) and no timber harvesting or management practices are anticipated in the WSA within the foreseeable future under either of the alternatives. Therefore, the issue was dropped from further analysis.

Impacts on Cultural Resources

Concern has been raised about possible impacts to cultural resources in the WSA. However, there are no known cultural resource sites and no known sacred or other areas of concern to Native Americans in the WSA. Cultural resource surveys will be made in response to specific project proposals, but at this time, particularly since no mineral development is projected under either alternative, analysis of cultural resource impacts would not be relevant, thus this issue was dropped from further analysis.

Social Impacts

A number of individuals have expressed concern about the possible social impacts of mining in the WSA and vicinity. However, this issue has been dropped from further analysis because no mining is projected under either wilderness designation or nondesignation. Social impacts will be analyzed in the environmental documents relating to any specific future mining proposals.

SELECTION OF THE PROPOSED ACTION AND DEVELOPMENT OF ALTERNATIVES

Development of the Proposed Action is guided by requirements of the Bureau's Planning Regulations, 43 CFR Part 1600 and the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing specific factors to be considered during the planning sequence in developing suitability recommendations.

The Proposed Action for the Red Mountain WSA is No Wilderness/No Action. Under this proposal, none of the 6,173 acres of the WSA will be designated wilderness. They will continue to be managed for multiple use under the constraints of the RNA and ACEC as described in this document and the planning documents for the Arcata Resource Area.

The rationale for this proposal is that the wilderness values of the area considered as a whole are not outstanding. Although the area is a legitimate WSA, it does have quite a few scars of mineral activity vehicle trails and test pits. Poor access and a general lack of recreational amenities make it a poor candidate for wilderness. Its unique vegetation can be adequately protected as an RNA/ACEC under multiple use.

One alternative was also considered--an All Wilderness Alternative which would designate the entire WSA (6,173 acres) and 282 acres of recently acquired and other adjacent BLM lands as wilderness. The All Wilderness Alternative represents the maximum possible acreage that could be recommended for wilderness designation.

ALTERNATIVES CONSIDERED BUT DROPPED FROM FURTHER ANALYSIS

A Partial Wilderness Alternative was considered but dropped from further analysis. Due to the WSA's small size and the fact that most existing disturbances are centrally located, further wilderness alternatives were not identified that would improve wilderness values by segregating areas with significant wilderness values.

Alternative 2 (No Action) and Alternative 3 (RNA/ACEC) of the Draft EIS were considered for separate analysis in this document, but it was decided to combine them into one alternative (the Proposed Action) because the RNA and ACEC have already been established.

Several reviewers of the Draft EIS (DEIS), including the Mendocino Board of Supervisors, recommended the consideration of an alternative designating a Research Natural Area/Area of Critical Environmental Concern but with no timber harvesting allowed. This suggestion is embodied in the Proposed Action. The RNA/ACEC has already been designated and management actions projected for both the Proposed Action and the All Wilderness Alternative call for no timber harvesting.

An alternative that included BLM acquisition of the mineral claims was considered but dropped because it did not constitute a wilderness designation or nondesignation alternative (the subject of this EIS). Further, such acquisition was not considered as a management action under any of the alternatives analyzed because such actions are improbable (because of budget constraints) and not (according to our analysis) relevant to impacts from wilderness designation or nondesignation.

Chapter 2

Proposed Action and Alternative

CHAPTER 2

PROPOSED ACTION AND ALTERNATIVE

Since the pattern of future actions within the WSA cannot be predicted with certainty, we have made projections of management actions to allow the analysis of impacts under the Proposed Action and alternative. These projections are the basis of the impacts identified in this EIS. They represent reasonably feasible patterns of activities which could occur under the Proposed Action and alternative analyzed assuming there is adequate funding.

PROPOSED ACTION (NO WILDERNESS/NO ACTION)

Wilderness	0 Acres
RNA/ACEC	6,895 Acres

Under this alternative the entire WSA (6,173 acres) and 722 acres of adjacent and nearby lands will continue to be managed as a Research Natural Area (RNA) and an Area of Critical Environmental Concern (ACEC). See Map 2-1.

Vegetation Management Actions

Based on ongoing Bureau-funded research in the WSA, the following vegetation management actions will be proposed:

1. Artificially seed areas currently supporting Ceanothus pumilus and Eriogonum kelloggii with Arabis mcdonaldiana. This will not cover more than one acre per year because of the difficulty of obtaining seed and will be continued only if favorable results are obtained.

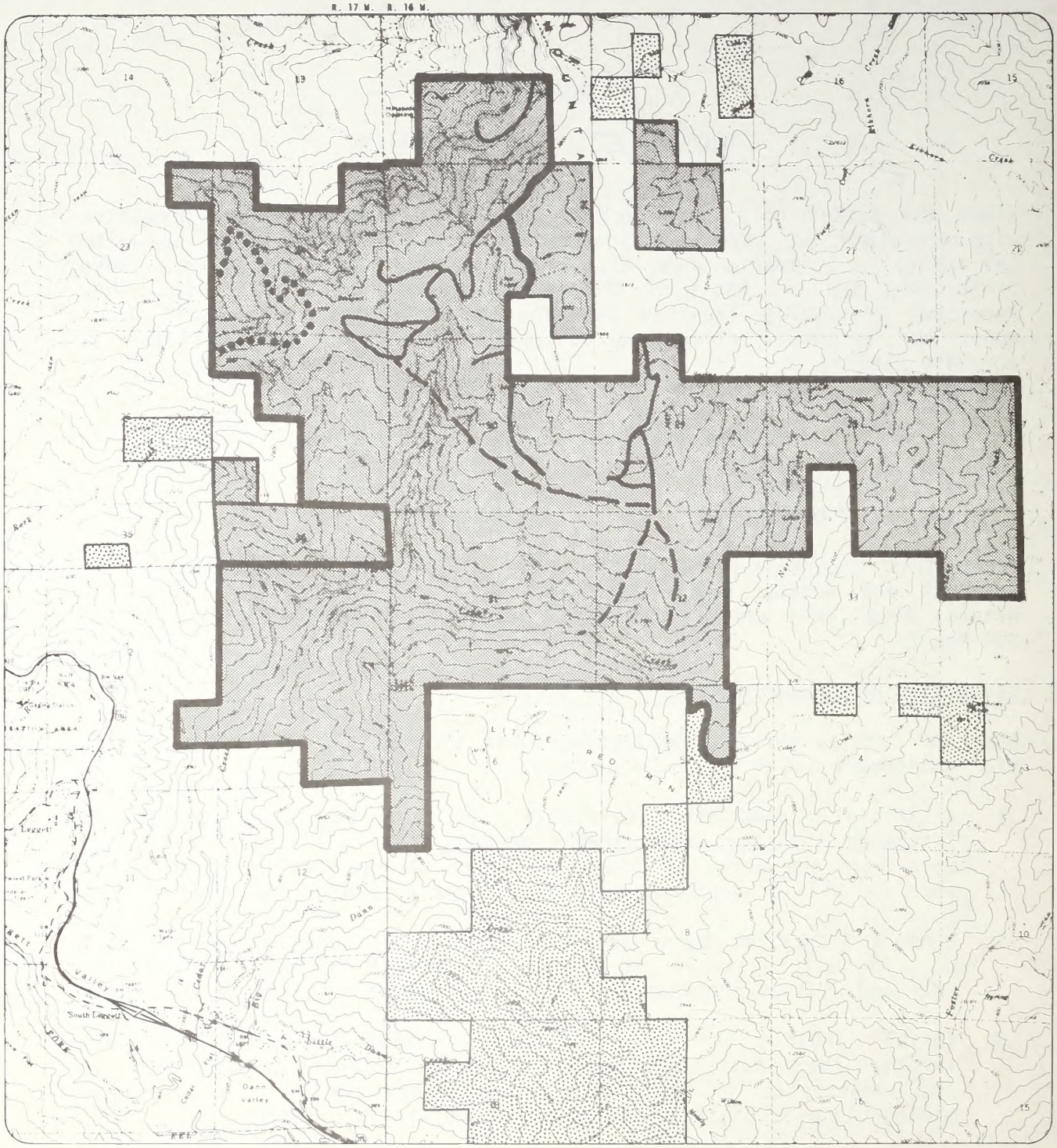
2. Conduct prescribed burns in unstable areas or zones of bedrock that contain soils suitable for Arabis. This will involve 1.5 acres per year and will be continued as long as favorable results are obtained.

3. Install vehicle barriers where road maintenance activities could threaten the survival of Arabis populations adjacent to the road. If the construction of new roads is necessary for vehicle access to mining claims, construct the roads around Arabis colonies.

4. Up to approximately 1,000 acres on the northern boundary adjacent to the WSA will be acquired to protect wildlife habitats and unique vegetation communities.

Timber Management Actions

None planned.



Map 2-1 Proposed Action
(No Wilderness/No Action)

- Wilderness Study Area Boundary
- Roads
- Ways
- Fire Trail
- ACEC/RNA
- BLM Managed Land outside ACEC/RNA

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UKIAH DISTRICT

RED MOUNTAIN
WILDERNESS STUDY AREA

N

Scale
0 1/4 1/2 1 mile

Fire Management Actions

5. Full fire suppression will be practiced in the Red Mountain WSA until a resource area fire management plan is completed. It is anticipated that this plan will allow the use of mechanized equipment only on designated roads and areas that will not affect sensitive plant habitats unless a fire threatens human life or private lands. No presuppression activities will be conducted until a field inventory is completed. There are no existing firebreaks and no new firebreaks are planned.

Wildlife Management Actions

6. To avoid disturbing nesting peregrine falcons, the use of mechanized equipment (for potential management actions such as clearing log jams on Cedar Creek) and public vehicle access will be prohibited on approximately one-sixth of the WSA from February 1 through July 30.

7. Conduct a five-year census of juvenile steelhead in Cedar Creek; monitor quality and quantity of spawning habitat; if necessary develop site-specific measures to increase spawning areas. These are likely to include log jam removal and construction of gabions to allow water-flow more suitable for spawning. Mechanized equipment will be used.

Water Quality Management Actions

None planned.

Recreational Use Management Actions

8. Designate the ACEC "closed" to public vehicle use; "open" to administrative and emergency use; "limited" to existing roads for mining claim assessment work and scientific research. ORV use will continue to be low--fewer than 20 visitor days per year. It is currently about 40 visitor days per year.

9. Conduct Ranger patrols at least once every two months by vehicle.

10. The WSA will also be open for nonmotorized recreation activities including hiking (the main attraction being the rare plants and soils), hunting and fishing. Recreational use for these activities will remain constant at levels below 30 visitor days annually. No recreational facilities or hiking trails exist in the WSA and none are planned. Development of recreation facilities, such as campgrounds is not anticipated because of the low use the area receives.

Mineral Development Management Actions

11. As explained on page 1-5 and in the Appendix, no mineral development is anticipated under either alternative. However, some annual assessment work including road maintenance and some test pit studies using mechanical equipment is anticipated despite our prediction of no actual development. Fewer than 2 acres per year will be disturbed.

ALL WILDERNESS ALTERNATIVE

Wilderness	6,455 Acres
Nonwilderness	0 Acres

Under this alternative the entire WSA (6,173 acres) and 282 acres of adjacent public lands would be designated wilderness. See Map 2-2.

Management Actions

The management actions under wilderness would be the same as those described above for the Proposed Action with the following exceptions:

1. No new roads would be constructed and heavy equipment would not be used, so barriers would not be necessary to protect Arabis colonies adjacent to roads (see Management Action 3 and 11 for the Proposed Action).

2. Mechanical equipment would not be used for log jam removal or for gabion installation in Cedar Creek (see Management Actions 6 and 7, above).

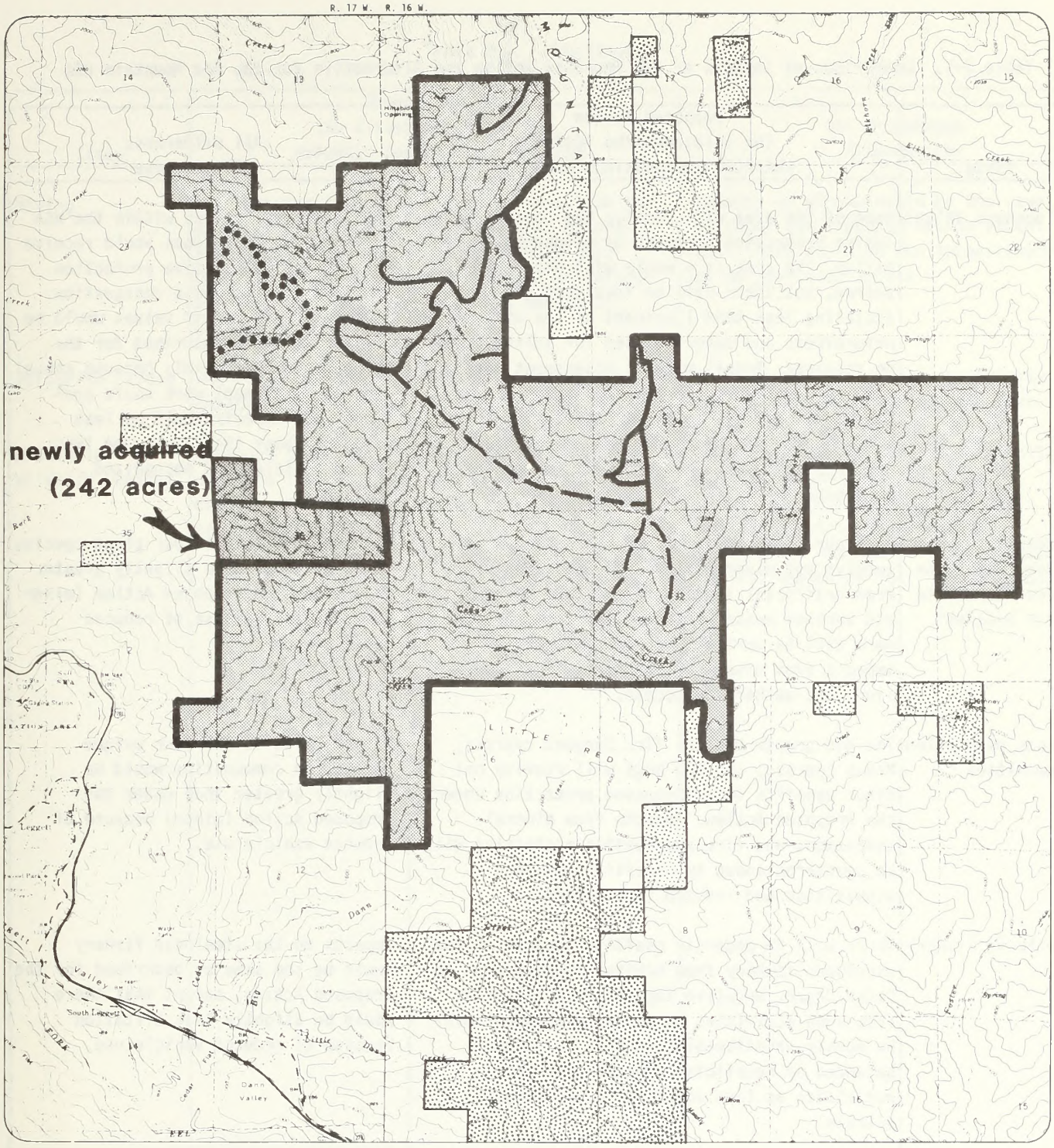
3. The use of borate and mechanized equipment for fire suppression would be even more restricted. It would not be used unless there are serious threats to human life or private lands and even then generally restricted to existing roads. (see Management Action 5, above).

4. The use of vehicles for administrative purposes would be prohibited (see Management Action 8, above).

5. Ranger patrols would be on foot (see Management Action 9, above).

SUMMARY OF SIGNIFICANT IMPACTS

Table 2-1 provides a comparative summary of the major impacts of the Proposed Action and the alternative.



Map 2-2 All Wilderness Alternative

- Wilderness Study Area Boundary
- Roads
- Ways
- Area Recommended Suitable
- BLM Managed Land outside Suitable Area
- Fire Trail

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UKIAH DISTRICT

RED MOUNTAIN
WILDERNESS STUDY AREA

N

Scale
0 1/4 1/2 1 mile

Table 2-1. Comparison of Impacts of the Proposed Action and Alternative for the Red Mountain WSA

Issue	Proposed Action (No Wilderness/No Action - RNA/ACEC Designations Remain)	All Wilderness Alternative
Wilderness Values	None of the area will receive the special legislative protection provided by wilderness designation. The area as a whole will not be impaired, but there will be localized areas (totaling less than 1 percent of the WSA) where naturalness and opportunities for solitude will be impaired. Annual mineral assessment work and fire suppression activities will be the main source of negative impacts. Positive impacts will result from reseeding endangered plants and restricting the use of ORVs and mechanical equipment.	The wilderness values within the WSA and some adjacent lands would receive the special legislative protection provided by wilderness designation. Impacts to wilderness values would be similar to those described for the Proposed Action, mainly because annual mineral assessment work would continue, but impacts would be less severe because there would be less use of vehicles and mechanized equipment.
Arabis mcdonaldiana and Three "Candidate Plant Species"	All four of the plant species of concern will receive net minor positive impacts. Benefits from artificial seeding, prescribed burning, and various means of protection from physical harm will be partially counterbalanced by impacts from mineral assessment, fire suppression, and authorized access.	Net benefits to all four plant species of concern would be slightly greater than under the Proposed Action (minor to moderate) because of reduced vehicle use.
Unique Vegetation Communities	The old-growth Douglas fir, Sargent cypress, McNab cypress, and two bogs will receive net minor benefits from increased protection under the Proposed Action. Impacts from mineral assessment and fire suppression activities will be counterbalanced by benefits from land acquisition and reduced fire hazard.	Net benefits to the four unique vegetation communities would be slightly greater than under the Proposed Action (minor) because of reduced vehicle use.
Steelhead Fishery	There will be moderate positive impacts on the steelhead fishery from habitat improvements in Cedar Creek. Negative impacts from siltation from such activities as mining assessment will be mostly unnoticeable and will be counterbalanced by beneficial impacts from such activities as land acquisition and ranger patrols.	Impacts on the steelhead fishery would be the same as described for the Proposed Action, except that there would be slightly less siltation because of reduced vehicle use.
Drinking Water	There will be no measurable impact on drinking water supplies.	Impacts on drinking water supplies would be the same as under the Proposed Action, except that there would be slightly less contamination because there would be less erosion.
Unique Soils	There will be only minor, localized disturbance of the unique soils; as a whole they will not be affected.	Impacts on unique soils would be the same as under the Proposed Action, except that there would be slightly less soil disturbance because of reduced vehicle use.

Table 2-1. (Continued)

Issue	Proposed Action (No Wilderness/No Action - RNA/ACEC Designations Remain)	All Wilderness Alternative
Mining	The Proposed Action will have no impact on the potential for mining within the WSA. Mineral assessment work will be made slightly more costly and less convenient, but the difference will not be enough to change the amount of assessment work done.	Impacts on mining would be the same as under the Proposed Action except that there would be the inconvenience of no vehicular access.
Peregrine Falcon	The Proposed Action will have no measurable impact on the endangered peregrine falcon.	There would be virtually no impacts on the endangered peregrine falcon.
Available Wildlife Habitat	Although there will be minor positive and negative impacts to wildlife habitat, no changes significant enough to affect wildlife populations will occur.	Impacts on available wildlife habitat would be essentially the same as under the Proposed Action, except that there would be even less disturbance because of the prohibition against vehicular use.

Chapter 3

Affected Environment

CHAPTER 3

AFFECTED ENVIRONMENT

This chapter briefly describes the WSA and the resources that would be impacted by the proposed action and alternative. Descriptions are only as detailed as needed for the reader to understand the effects of implementing the proposed action and alternative. Where impacts to resources would be slight or nonexistent, descriptions are brief or are omitted (see page 1-6 for a discussion of issues considered but dropped from further analysis).

More detailed descriptions of the resources in the study area and of regional socioeconomic conditions appear in the planning documents. Copies of these documents may be reviewed in the Ukiah District Office, (555 Leslie Street, Ukiah) and the Arcata Resource Area (1125 16th Street, Arcata).

WILDERNESS VALUES

NATURALNESS

Overall, this WSA is in a generally natural condition. However, man's imprint on the landscape of the WSA is noticeable in an area surrounding the crest of Red Mountain. Approximately 13 miles of roads and ways, most leading to some 30 mining test pits (prospects), exist in the north central portion of the area. There are also 2 miles of fire trails (Map 2-1). The roads and ways are narrow, dirt roads that usually fill in rapidly and gradually revegetate when abandoned. Those shown on Maps 2-1 and 2-2 as roads were maintained by Coastal Mining in the past for access to the test pits. These roads are technically "cherrystem" roads not within the study area. Obviously, however, they have an impact on the overall sense of naturalness.

Outside of these impacts, the WSA is mostly free of evidence of man. The inner gorge of Cedar Creek Canyon is essentially pristine in appearance.

OPPORTUNITIES FOR SOLITUDE

At low levels of use, a visitor is able to find solitude in the WSA. Opportunities to find a secluded place are somewhat impeded by the steep topography. Those who visit the area probably tend to frequent the gentler land near the top of Red Mountain or the narrow corridor of Cedar Creek. Anyone willing to traverse the steep slopes can avoid the sights and sounds of others. The open vegetation of the red soil area does not provide exceptional screening, but in other areas, the denser vegetation adequately hides visitors from each other.

Because of the small size of the WSA, outside noise from roads and adjoining private property is a potential problem. Low levels of use in those areas make the problem a minor one at present.

OPPORTUNITIES FOR PRIMITIVE AND UNCONFINED RECREATION

Resources for primitive recreation activities are limited in the WSA. Cedar Creek is the only water feature of any significance. It has a population of small trout that would sustain light fishing pressure; however, the creek is a steelhead nursery stream and fishing would not be encouraged.

Although most of the existing use is accounted for by hunters, the area as a whole has relatively low production potential for game species. Because of the unique environment, there are some interesting wildlife species that differ from those in the general region. And, because of the area's remoteness and undeveloped state, some species that require seclusion, such as mountain lion and bear, are relatively abundant.

Local residents report that they use the area for hiking, nature study, and general dispersed recreation. The small size of the WSA suggests a low total capacity for general public use for such purposes; however, in the case of nature study, the uniqueness of the ecosystem greatly enhances the values.

Overall visual attractiveness is moderate; although, again, values are enhanced by the "uniqueness" in the regional setting, i.e., the contrast of the red soil and different vegetation with the typical landscapes in the region.

SPECIAL FEATURES

Congress specified that wilderness areas "may also contain ecological, geological or other features of scientific, educational, scenic or historical value." These are optional wilderness characteristics. Red Mountain has some outstanding special features such as unique vegetation, including a listed endangered species Arabis mcdonaldiana, and unique lateritic soils. These are described on the pages that follow.

VEGETATION

The Red Mountain Wilderness Study Area (WSA) is composed of two distinct vegetation areas. The first is the typical mesophytic north coast range vegetation (i.e., mixed evergreen forest) growing in soil derived from Franciscan parent material. Secondly, there is the unique flora associated with the red soils derived from serpentinized ultrabasic igneous intrusions. Red Mountain has been recognized for well over a century for its extraordinary botanical significance.

The WSA is composed of seven plant communities (Cheatham and Haller, 1975, "An Annotated List of California Habitat Types," unpublished manuscript) (Map 3-1). They are:

1. Montane meadow/bog
2. Northern riparian woodland
3. Northern oak woodland
4. Mixed evergreen forest
5. Douglas-fir forest
6. Northern interior cypress forest
7. Coast Range mixed conifer forest/Jeffrey pine forest

It is difficult to place much of the vegetation of the WSA into widely accepted plant communities because classification systems are broad spectrum by design. The flora of Red Mountain is unique; therefore, the vegetation classifications available do not fit well.

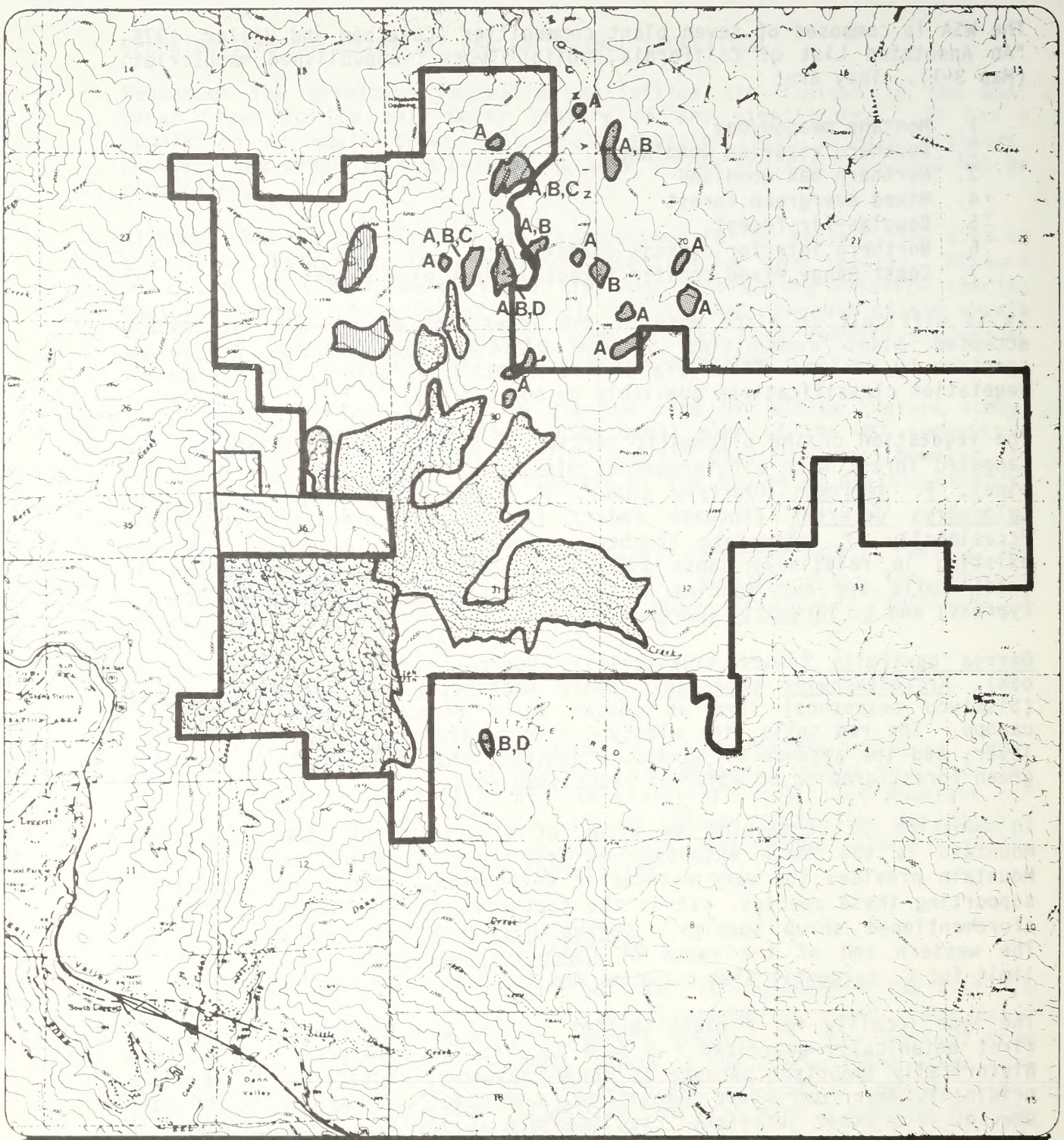
The vegetation of the ultramafic portion of Red Mountain consists of open canopied forest with a heterogenous mixture of Pinus ponderosa (ponderosa pine), P. jeffreyi (Jeffrey pine), P. lambertiana (sugar pine), and Calocedrus decurens (incense cedar) filling the overstory component. Occasionally, P. attenuata (knobcone pine) will be a canopy component existing in relatively dense stands. Also occurring on the ultramafic (red) soils are two species of cypress, Cupressus macnabiana (McNab's cypress) and C. sargentii (Sargent cypress).

Garrya buxifolia (dwarf silk-tassel), Quercus vaccinifolia (huckleberry oak), Arctostaphylos canescens (hoary manzanita) and Ceanothus pumilus (Siskiyou ceanothus) form an uneven shrub component beneath the tree canopy. The red soils, the widely scattered trees with a prominent shrub layer, and the absence of hardwoods contrast sharply with the mixed evergreen forest growing on adjacent Franciscan soils.

In addition to containing an array of diverse plant communities, Red Mountain is the range extension of four species, which means that Red Mountain provides the very extreme of environmental parameters capable of supporting these species. It is the southernmost extension of two of the aforementioned shrub species, Garrya buxifolia and Ceanothus pumilus. The western end of the range of Cupressus macnabiana and the northern limit for C. sargentii also occur on Red Mountain.

The type locality for a plant species is that place where the species is first botanically described. A type locality is both scientifically and historically important because it allows taxonomic comparisons between the originally described plant species and subsequent collections of the same species from other locations. Red Mountain is the type locality for nine plant species:

1. Arabis mcdonaldiana (McDonald's rock-cress)
2. Eriogonum kelloggii (Kellogg's buckwheat)
3. Sedum laxum ssp. eastwoodiae (Red Mountain stonecrop)
4. Silene campanulata ssp. campanulata (Red Mountain catchfly)
5. Garrya buxifolia (dwarf silk tassel)
6. Hesperolinon clevelandii var. petrophiluns (Cleveland's flax)



Map 3-1 Botanical Values

Wilderness Study Area Boundary

SENSITIVE PLANT SPECIES

- A *Arabis macdonaldiana*
- B *Eriogonum kelloggii*
- C *Sedum laxum ssp. eastwoodiae*
- D *Silene campanulata ssp. campanulata*

- Mc NAB CYPRESS
- SARGENT CYPRESS
- OLD-GROWTH DOUGLAS FIR

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7. Lupinus lyallii (Lyall's lupine)
8. Phacelia corymbosa (Red Mountain phacelia)
9. Synthyris. reniformis var. cordata (Red Mountain synthyris)

In addition, there are two bogs on public domain immediately adjacent to the WSA in T. 24 N., R. 16 W., MDM (Section 17, Lot 10; and Section 20, Lots 2 and 3 and E½NW¼) that are the type locality for six other plant species (Red Mountain planning documents, 1978):

1. Carex mendocinensis (Mendocino sedge)
2. Cypripedium californicum (lady slipper orchid)
3. Gentiana setigera (Mendocino gentian)
4. Narthecium californicum (California bog-asphodel)
5. Scirpus criniger (Criniger's bulrush)
6. Tofieldia glutinosa ssp. occidentalis (Occidental tofieldia)

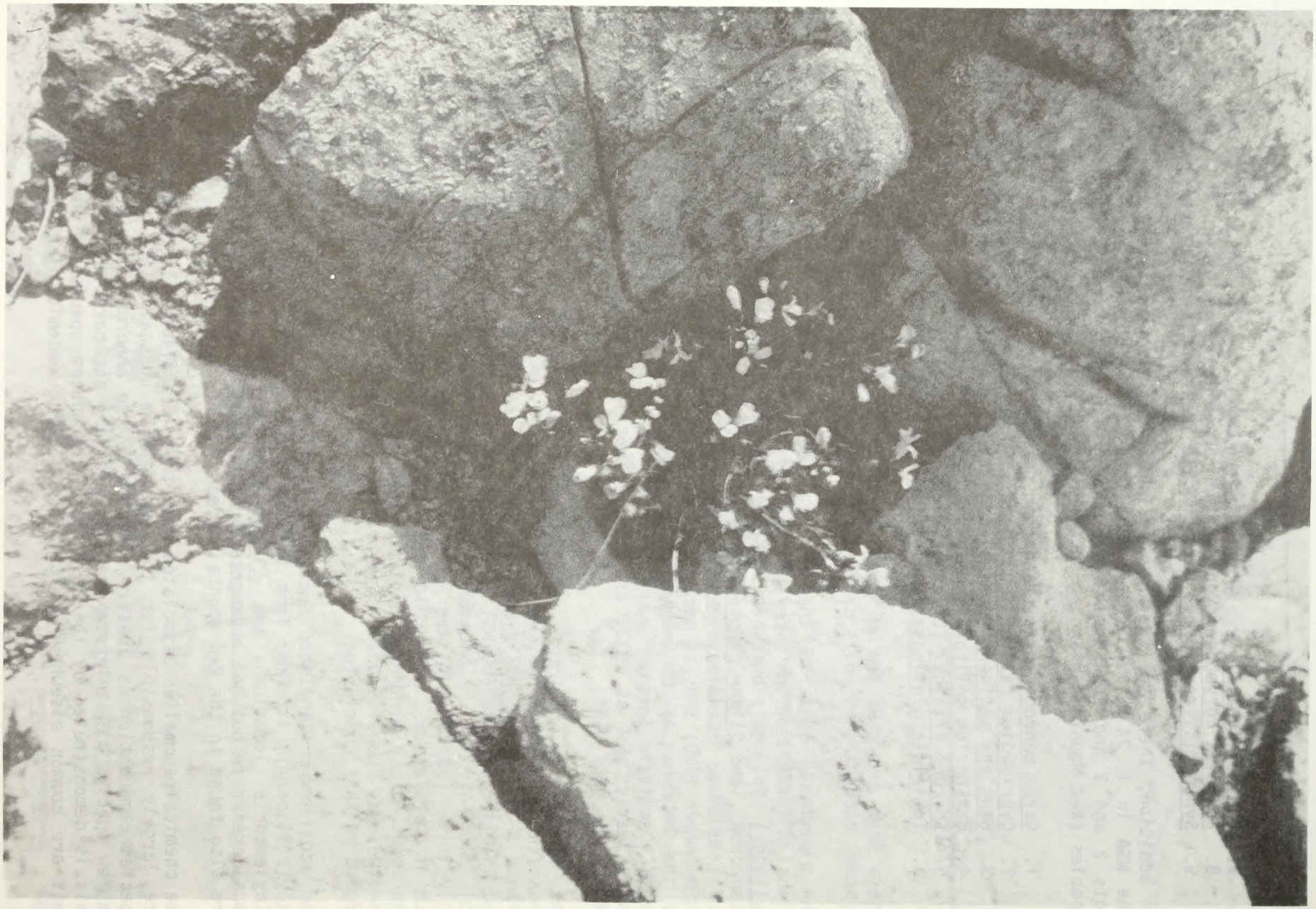
These bogs are rare and of great value in that they are undisturbed ecosystems occurring on soils derived from ultrabasic rock.

The ultrabasic soils of the Red Mountain area support the entire known global distribution of three plant species, and probably four. Eriogonum kelloggii (Kellogg's buckwheat), Sedum laxum ssp. eastwoodiae (Red Mountain stonecrop), and Silene campanulata ssp. campanulata (Red Mountain catchfly) are considered "Candidate Species" (Federal Register, Vol. 45, No. 242, 15 December 1980) and, as such, are currently under review by the Secretary of the Interior as threatened or endangered. Under current BLM policy, these "Candidate Species" are afforded the full protection of the Endangered Species Act of 1973, as amended, until a decision concerning their rarity has been made.

The occurrence of Arabis mcdonaldiana (McDonald's rock-cress) on Red Mountain is further evidence of the area's wealth of botanical values (Photo 3-1). A. mcdonaldiana has been federally listed by the U.S. Fish and Wildlife Service (USFWS) as endangered of extinction (Federal Register, Vol. 45, No. 242, 15 December 1980). This makes A. mcdonaldiana one of only three federally listed species occurring on public land managed by BLM in California. The USFWS and BLM consider the Red Mountain area to represent the worldwide distribution of A. mcdonaldiana; there is, nonetheless, considerable controversy within the scientific community regarding this conclusion.

One additional "Candidate Species," Cypripedium californicum (California lady's slipper), is known from the Red Mountain area. Lomatium englemanii (Englemann's lomatium) and Lilium rubescens (redwood lily), species considered rare but not endangered by the California Native Plant Society, are also found in the Red Mountain area.

The chemical anomalies associated with the ultramafic soils of Red Mountain are largely responsible for the exceedingly unusual flora and ecology. Species competition is greatly affected by the abnormal chemistry in that so few species can tolerate the extraordinary and harsh soil environment. This is demonstrated by the absence of introduced species on Red Mountain that are common elsewhere in California. The endemic plant species are



Arabis macdonaldiana, endangered plant species.

PHOTO 3-1

very fragile and sensitive to disturbance because they survive in an extreme environmental situation. It has been hypothesized that the soils have experienced a tropical weathering process evidenced by the eluviation of silica and magnesia and the accumulation of ferric oxides and heavy metals. Rare soils in combination with topography and climate have created an unlikely and specialized niche.

The ultramafic unit, however, is not the sole source of botanical interest and value in the WSA. There is a stand of old-growth Douglas-fir forest located on the Franciscan derived soils. At least 200 years are required to develop the old-growth forest vegetation characteristics found there.

TIMBER

The timber production capability classification (TPCC) conducted in 1977-78 identified approximately 1,600 acres of commercial forestland (CFL) within the boundaries of the Red Mountain Wilderness Study Area. About one-half of the CFL is within Sections 1 and 2 of T. 23 N., R. 17 W., bordering Cedar Creek. The management framework plan for the Red Mountain Planning Unit identified this particular area as an "old-growth reserve" where timber harvest will not occur. Good data do not exist to accurately establish the amount of standing volume; however, assuming an average of 20 thousand board feet per acre (a reasonable estimate for poorly stocked virgin timber stands in this area), the standing volume would be about 18 million board feet of commercial Douglas-fir in the area outside the old-growth reserve available for timber management. The timber would be worth about $2 million at current market value.

WILDLIFE

The Red Mountain WSA contains a unique assemblage of habitat types and wildlife species. Moist habitats and extremely dry and scarce red soil habitats are situated in close proximity to each other. Numerous animals adapted to both habitats are present in a relatively small area. In all, seven major vegetation or habitat types are present in the WSA. Also present is valuable riparian habitat along Cedar Creek, a significant steelhead spawning and fish rearing tributary of the South Fork of the Eel River. September 1982 sampling conservatively estimated juvenile steelhead trout in excess of 11,600 individuals in Cedar Creek within the WSA (BLM 1983, "Draft Cedar Creek habitat management plan"). Some use of this stream by both king and silver salmon has also been noted, although limited in extent and regularity.

Being remote with little human activity at present, the area provides excellent habitat for mountain lion and bear. River otter utilize the aquatic habitat of Cedar Creek. The WSA also includes an important portion of the feeding territory of the endangered peregrine falcon. The golden eagle uses the area on a more regular basis with periodic use by the bald eagle, primarily during winter. An old-growth forest straddles a portion of Cedar Creek, providing habitat for the spotted owl, a species for which there is growing public concern. This owl appears on the U.S. Forest Service and U.S. Fish and Wildlife Service sensitive species lists and on

the California Department of Fish and Game species of special concern list. Suitable habitat for several other raptors, including the goshawk, also is present. Certain of the less mobile small animals inhabiting the red soil area have adapted a reddish background coloration. This adaptive coloration has been noticed primarily in spiny lizards (Sceloporus) and in insects.

In summary, the WSA provides all or an important portion of habitat for species that require seclusion. It also contains endangered species, game species, and unique species within the relatively small area.

SOILS AND WATERSHED

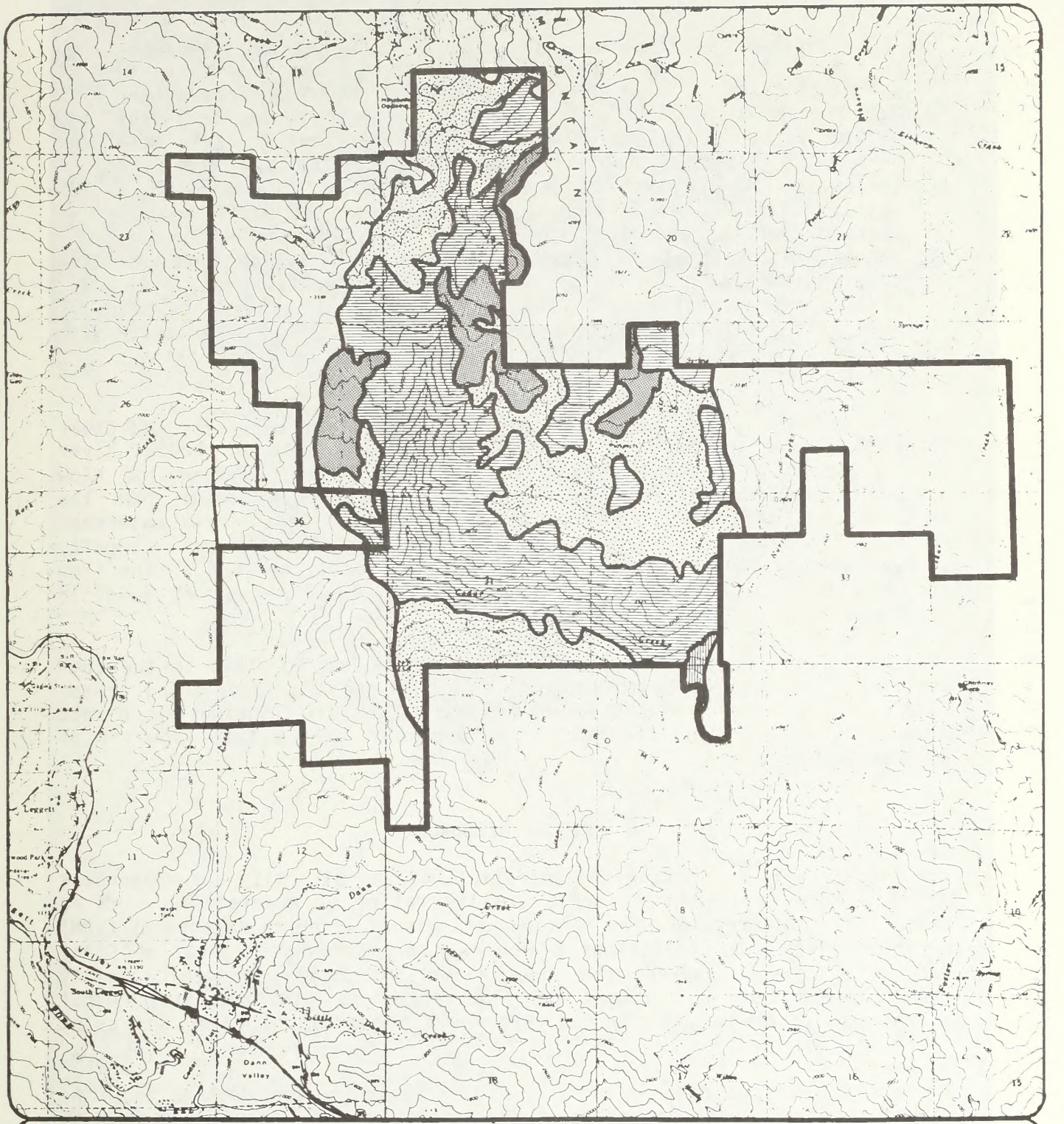
Of the 6,173 acres in the WSA, 3,635 acres are the red soils (Dann and Dann-Maymen) that give the mountain its name (Map 3-2). Red soils occur in several areas of California and in other states. The red color is due to the weathering of iron rich minerals to iron oxide.

The red soils on Red Mountain are different from almost all the other red soils in the U.S. because they have a very high content of iron, cobalt, and nickel and a very low content of everything else, including all of the nutrient elements needed for plant growth. These soils were first identified in the tropics and were formerly called laterites, lateritic soils, or latasols. Now they are classified in the soil order oxisols if the subsurface oxic horizon meets several specific criteria. If the oxic horizon is less fully developed, they are classified into oxidic families of other soil orders.

These red soils clearly have outstanding and unique values for both scientific and educational uses. What makes them unique is the same thing that makes them valuable for mining, the very high content of iron, cobalt, and nickel. What makes them important for soil scientists is the riddle of how these tropical soils can occur in a temperate zone climate. Tropical soils have not received as much research attention as have temperate zone soils. As world population continues to increase, it will be essential that we learn more about tropical soils.

Dr. Hans Jenny, a professor emeritus of soil science at the University of California at Berkeley, has summed up the case for Red Mountain as follows (Letter to BLM from Dr. Hans Jenny, June 1977):

> The Red Mountain soil series have long been a curiosity to geologists and pedologists (soil scientists) alike, and both groups have executed detailed chemical and mineralogical analyses. Whereas geologists search for economically promising minerals, the pedologists want to know why the soils have become what they are, how they originated and where they are going. How does nature create a rich soil or a poor one? The answer is of scientific and practical interest.



Map 3-2 SOIL

Wilderness Study Area Boundary

DANN Varient clay loam 2 to 10 percent slopes

DANN-DANN Varient -MAYMEN Varient Complex 5 to 30 percent slopes

DANN-MAYMEN Varient Complex 5 to 30 percent slopes

MAYMEN Varient-DANN Complex 5 to 75 percent slopes

Various non-red soils

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> The departure of silica and magnesia from soil and the simultaneous enrichment of red iron oxides as amorphous gels and goethite and hematite crystals of oxidic and ferritic mineralogy characterize the many lateritic, red soils of tropical regions. The opinion prevails that at some time in the past Red Mountain must have experienced a tropical climate to acquire the red soil colors, which are seen as relicts or fossils. This view, if valid, elicits profound repercussions on ideas of biotic evolutionary trends, geological history and climatic change of California. Red Mountain is destined to become the proving ground of testing the pros and cons of the hypothesis. Whatever the final answer, representative sites of the red soils deserve to be set aside and protected for the benefit of future scientific investigations. This effort rivals the significance of the billions spent on exploring the soils on the moon.

Most of the WSA is drained by Cedar Creek and its tributaries, and Cedar Creek is one of the major tributaries of the South Fork of the Eel River (Photo 3-2). Of special importance is the fact that during low flow periods the flow contribution of Cedar Creek is much larger than the relative size of its watershed would indicate. The Cedar Creek watershed represents 6 percent of the South Fork of the Eel watershed above Leggett, whereas at low flow Cedar Creek contributes about 17 percent of the flow at Leggett. Low flow levels are critical to the survival of juvenile steelhead.

Several hundred people live around the base of Red Mountain in the communities of Cummings, South Leggett, Leggett, and the intervening areas. Almost all of these households get their water from springs or direct diversions from one of the half dozen perennial creeks that flow off of Red Mountain.

VISUAL RESOURCES

The landscape is not considered majestic, but the diversity and uniqueness of this area result in a scenic quality rating of moderate to high as defined by the Bureau of Land Management's Visual Resource Management (VRM) program. The lower elevations of the WSA are somewhat typical of Coast Range landscapes; however, the upper elevations possess a scenic quality that evolves from the unique soils and erosional characteristics that support an uncommon yet diverse pattern of vegetative species and color contrasts (Photo 3-3).

The area is viewed only in part from observation points outside the WSA. Vacationers and local travelers see glimpses of the upper elevations of the study area from Highway 101. The tops of Red Mountain and Little Red Mountain are especially visible due to the red soils, although these views are generally short in duration. These vistas are some 3 to 5 miles in distance and fall in the middleground zone. The majority of the study area is seldom seen from the highway or the community of Leggett. Use figures along this stretch of Highway 101 for 1979 indicate peak monthly

Cedar Creek.

PHOTO 3-2

View of Red Mountain from Little Red Mountain.

PHOTO 3-3

traffic volume at 7,000 average daily traffic (ADT). Other views of the WSA are from Mail Ridge to the east where a growing number of people have taken up new residence. Views from Mail Ridge look down the Cedar Creek drainage and include the upper elevations of Red Mountain. Use levels within the study area are relatively low; however, attitudes for the area are high. Local residents are especially sensitive towards the WSA itself, while tourists who travel the area have a generally high level of appreciation of the scenic beauty of the region as a whole. The combined sensitivity for the study area, based on use volumes and user attitudes, is rated high.

MINERAL RESOURCES

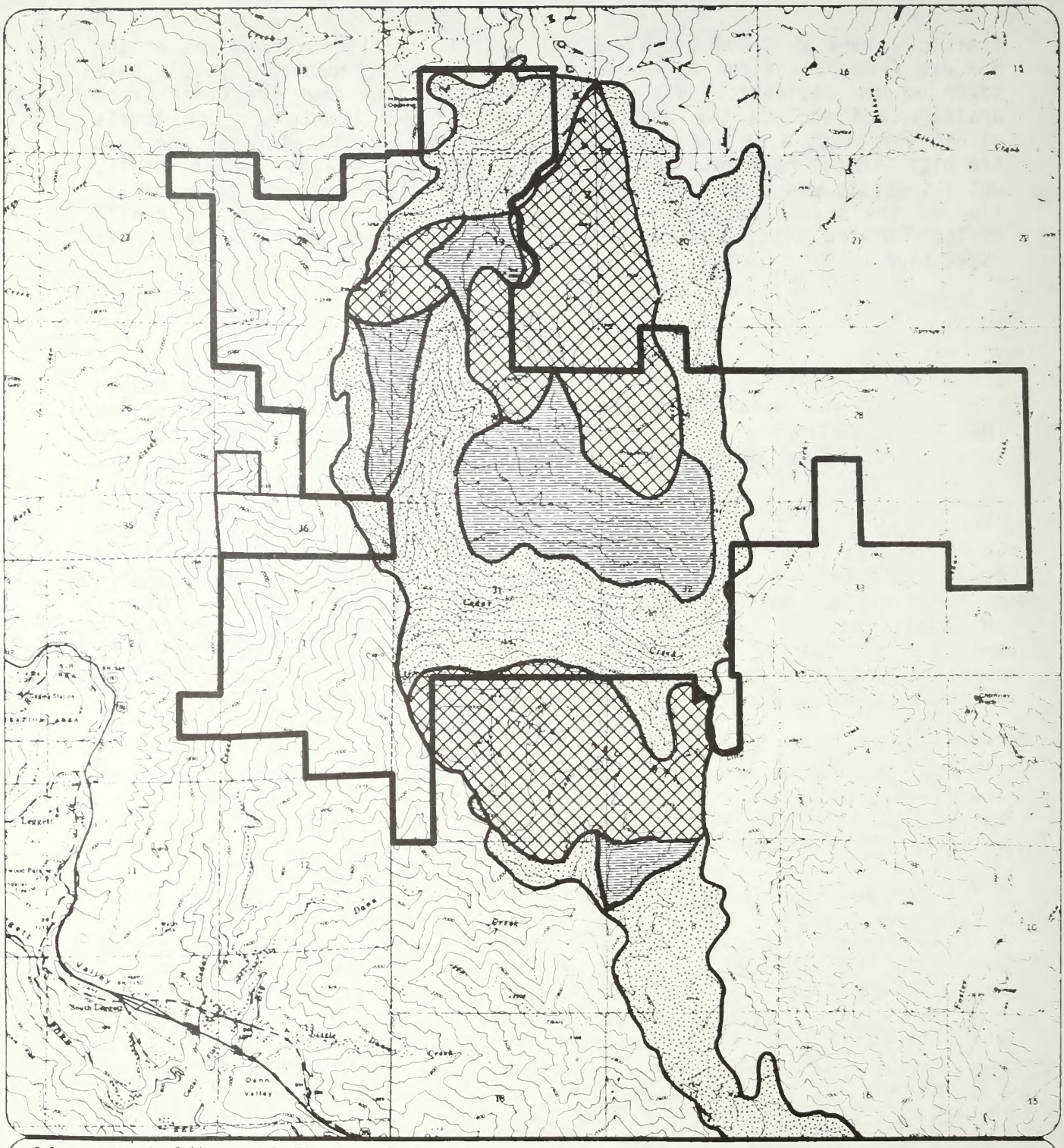
A Geology-Energy-Mineral (GEM) assessment was prepared to identify potential energy and mineral resources as defined by the WSA study policy (Map 3-3). Following is a summary of findings in the report. Specific information may be found by referring to the GEM report.

There is no established mining district in the WSA, but Red Mountain and Little Red Mountain have been known to have chromite deposits for many years, and at least 100 tons of chromium ore have been shipped. Drilling by at least three major mining companies over the past 30 years indicates 30 to 40 million tons of material with about 0.8 percent nickel and values in cobalt and chromium. All three are strategic metals, i.e., minerals that are considered vital to the security of the nation and for which domestic production may not be adequate during time of war. Current policy direction is to not preclude future development whenever possible.

There are no patented claims in the WSA. There are a great many unpatented claims, essentially covering a band about 6 miles long from north to south and 2 miles wide from east to west, and covering the central one-third of the Red Mountain WSA. They completely cover the rock type that has potential for nickel resources.

A history and description of mineral prospects (Photo 3-4) and of known mineralized areas are discussed in both the management framework plan and the GEM report. There are 39 lode claims and 41 placer claims located within the WSA. These claims and adjacent private lands owned by Coastal Mining Company and others are delineated on Map 3-4. Most of the known mineralized zone lies adjacent to the WSA on private lands. The estimates of 30 to 40 million tons of laterite averaging 0.8 percent nickel include both public and private lands. Content of the laterites runs from 0.74 to 1.12 percent nickel, 0.06 to 0.1 percent cobalt, and 1.29 to 1.44 percent chromium.

Because of our country's net import reliance of greater than 90 percent for cobalt and chromium and greater than 68 percent for nickel, there has been increased interest in domestic laterite deposits as sources of these metals in the event of interruption of foreign supplies. The Bureau of Mines looked at ten major occurrences of similar deposits in southern Oregon and northern California in 1978. Preliminary feasibility studies at that time suggested that a minimum of 35 million short tons of laterite averaging 0.8 percent nickel was necessary to approach minability. Of the ten, only three, including Red Mountain-Little Red Mountain, met this



Map 3-3 Mineral Potential

- Wilderness Study Area Boundary
- HIGH - Deep Laterites
- HIGH - Rocky Laterites with developed soil profile
- MODERATE
- LOW

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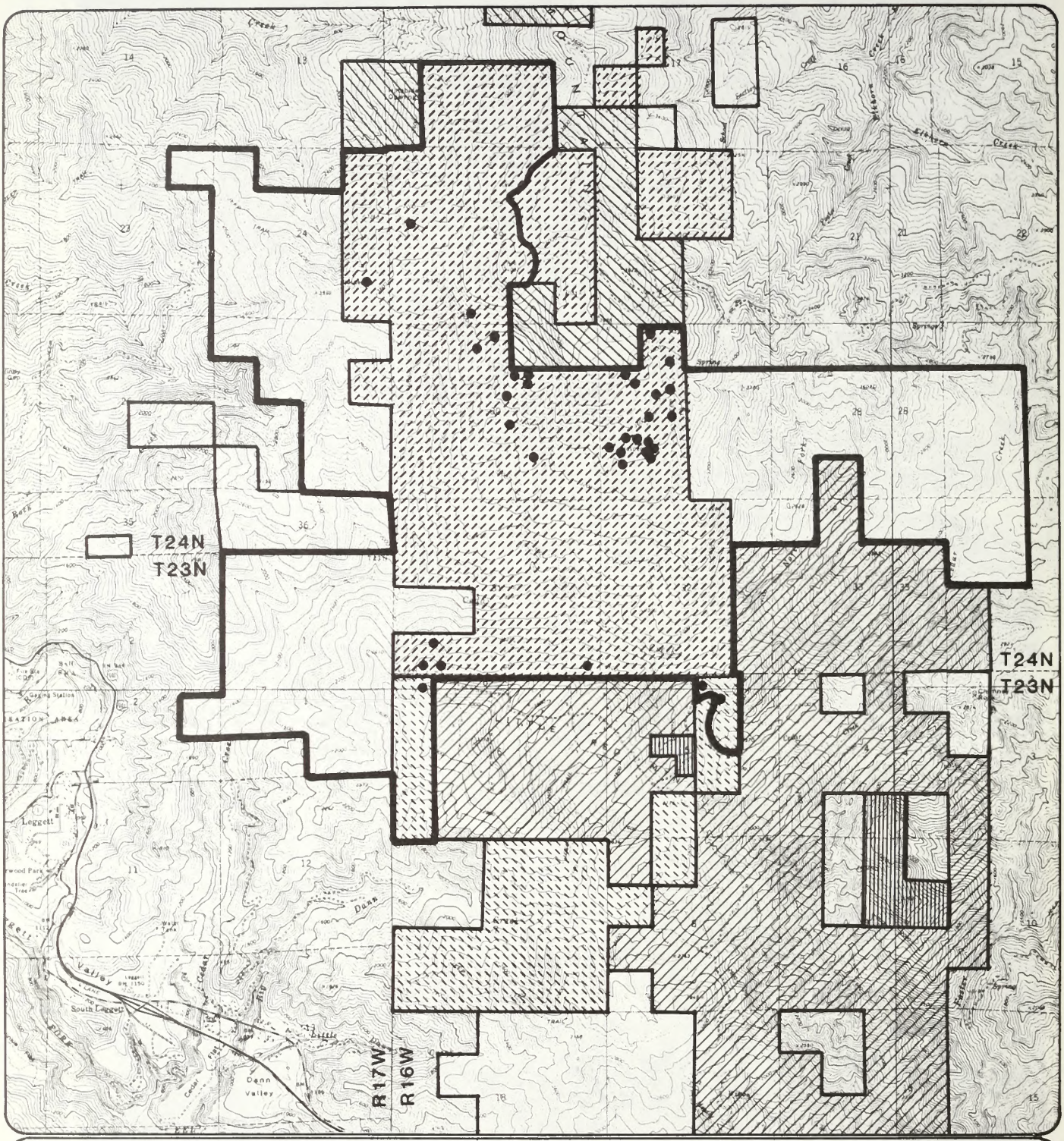
Mineral "prospect" (ore sampling trench).

PHOTO 3-4



Map 3-4 Mining Claims

- Wilderness Study Area Boundary
- **BLM Managed Land**
- Private Land
- Mining Claims held by Coombs
- Coombs acquired from Coastal
- Mining Claims held by Coastal
- Coastal Mining Co.
- Musgrave Acquired from Coastal
- Ore sampling trenchs

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minimum tonnage-grade test. In fact, Red Mountain-Little Red Mountain ranked second behind the Riddle operation and ahead of the Gasquet Cal-Nickel property. Assuming Cal-Nickel can operate at a profit, Red Mountain-Little Red Mountain should look even better (Letter to BLM, Bureau of Mines, April 21, 1983). As technology advances, the economics will also become more favorable for Red Mountain. The Bureau of Mines has been working on recovery techniques for western laterites that consume less energy and have been getting promising results. However, Coastal Mining Company has recently sold off some of its fee lands and mineral claims to a number of different parties, none of which have a mineral development history.

The most likely mining operation on Red Mountain would be an open-face bench type that would involve removal and processing of the mineral-bearing red soil layer. The ore would be processed at a mill site on public or adjacent private lands. Spoil disposal areas would be necessary, and an internal transportation system, perhaps involving cable trams across Cedar Creek Canyon, would be developed.

There are no known nonmetallic mineral deposits, material sites, uranium and thorium deposits, or known geothermal resources in the WSA. Portions of the western half of the WSA are speculatively valuable for oil and gas.

Chapter 4

Environmental Consequences

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

This chapter focuses directly on the issues identified in Chapter 1. The environmental impacts of the management actions included in the Proposed Action and the alternative are described issue by issue. The environmental impacts of the alternative on the area's other resources have also been analyzed and have been found to be insignificant. To understand this analysis the management actions of the Proposed Action and alternative must be understood (see Chapter 2).

There are no separate headings in this chapter for mitigating measures or cumulative impacts. All potential mitigating measures have been incorporated in the Proposed Action and alternative; no new measures were developed during the analysis. Cumulative impacts have been specifically discussed by the interdisciplinary team and, where appropriate, incorporated into the analysis below.

Because of the general nature of this analysis and the lack of numerical and statistical information regarding the area's resources, impacts in this section are often expressed in relative terms. For the purpose of this analysis the meanings of these terms are as follows:

- Negligible or slight impact - the degree of anticipated environmental impact is considered less than minor.

- Minor impact - comparatively unimportant; in terms of the area's wildlife resources, a minor impact is one affecting a specific group of individuals of a population in a localized area for one generation or less; the integrity of the regional population is not likely to be affected.

- Moderate impact - an effect sufficient to cause a change in the abundance of a resource or its distribution. In terms of the area's wildlife, the abundance or distribution of a portion of the regional or local population would change over more than one generation, but would not affect the integrity of the regional population as a whole.

- Major impact - an effect sufficient to cause a decline in the abundance of a resource or a change in distribution of a resource. In terms of the area's wildlife, the abundance or distribution of the regional or local population of a species would decline beyond which natural recruitment would not likely return that population to its former level within several generations.

PROPOSED ACTION
(NO WILDERNESS/NO ACTION)

The primary concern under the Proposed Action is the impact on wilderness values, endangered plants, and water supplies from vehicular use and mineral assessment work.

IMPACTS ON WILDERNESS VALUES

The Proposed Action for the Red Mountain WSA will result in none of the 6,173 acres within the WSA being designated wilderness. None of the wilderness values will receive the special legislative protection provided by wilderness designation. The wilderness values of naturalness and opportunities for solitude and primitive recreation will continue to receive minor impacts from mineral assessment work and vehicular use, but the area as a whole will not be impaired.

There will be localized and generally temporary impacts to naturalness from 1- to 2-acre prescribed burns, the construction of vehicle barriers to protect Arabis colonies, mineral assessment work, including the construction of occasional access roads, and fire suppression activities (if necessary). See Management Actions 2, 3, 5, and 11 on pages 2-1 and 2-3. In most cases, natural vegetation succession plus reclamation efforts will return the areas involved to a natural-appearing state within 2 to 10 years and the combined area affected will be less than 1 percent of the WSA.

Naturalness as well as opportunities for solitude and primitive recreation will be enhanced by the acquisition of 1,000 acres of adjacent land (Management Action 4). Development will be less likely to take place on this land under government ownership and if development occurred, proper reclamation will be more likely under BLM ownership.

Although the steelhead habitat improvement work on Cedar Creek (Management Action 7) will cause some disruption of naturalness and solitude (the latter by the noise during construction), when completed the work will be substantially unnoticeable and the improved fishery will enhance the wilderness values of the area in the eyes of the public.

The closure of the ACEC (which includes all of the WSA plus 722 acres of adjacent and nearby lands) to ORVs (Management Action 8) will enhance both naturalness and opportunities for solitude by eliminating the physical damage caused by (and the visual and noise intrusion of) the vehicles. However, it will only be a reduction of about 20 ORV use days per year (from fewer than 40 per year to fewer than 20 per year).

The seasonal prohibition of the use of mechanized equipment (Management Action 6) will eliminate some disturbance and, thus, have an impact similar to that described for the ORV closure in the paragraph above. However, most of the use displaced by this management action will simply be displaced to another time of year.

The special features of the Red Mountain WSA include the endangered plant Arabis mcdonaldiana plus three "candidate plant species" for Federal listing and the unique red soils upon which they depend. As described below, the plant species of concern will receive net minor positive impacts including several areas of expanded occurrence while the soils will receive minor localized disturbances.

Conclusion:

None of the area will receive the special legislative protection provided by wilderness designation. The area as a whole will not be impaired, but there will be localized areas (totaling less than 1 percent of the WSA) where naturalness and opportunities for solitude will be impaired. Annual mineral assessment work and fire suppression activities will be the main source of negative impacts. Positive impacts will result from reseeding endangered plants and restricting the use of ORVs and mechanical equipment.

IMPACTS ON THE ENDANGERED PLANT, ARABIS MCDONALDIANA, AND THREE "CANDIDATE PLANT SPECIES" FOR FEDERAL LISTING

All four of the plant species of concern will receive net minor, positive impacts under the Proposed Action which assumes that mineral development will not take place (see the Appendix). Seeding of Ceanothus, Eriogonum, and Arabis will result in several new and expanded areas of occurrence for those species, and they (especially Arabis) will benefit from improved habitat created by small prescribed burns and protection from vehicle damage (see Management Actions 1-3 on page 2-1). There will be moderate benefits to these plants from the acquisition of adjacent lands (Management Action 4) and the resulting protection of the acquired habitats. Designation of the existing ACEC as "closed" to public vehicle use and the seasonal no surface occupancy restriction will also have a positive impact, but it will be very minor because ORV and non-ORV use of the area has always been very low due to the rough terrain and limited access (see Management Actions 6 and 8 on page 2-3). Minor to negligible negative impacts will be caused by Management Actions 5, 10, and 11. The potentially most damaging of them will be the mineral assessment work, but fewer than 2 acres per year will be disturbed. Some damage to the habitats of the plants will occur because they are dependent on the soils with the greatest mineral potential, but efforts to avoid plant habitats will in most cases be successful. Fire suppression activities are not likely to occur, but if they do, damage to these four plant species could occur because the habitats involved are often difficult for equipment operators (and others) to identify and avoid. However, since the habitats are scattered and large acreages of disturbance are not expected in any event, the damage will not be more than moderate. The same sort of reasoning will apply to potential damage from nonmotorized recreation, although the potential for damage is lower and it will occur at that low level each year. Ranger patrols (Management Action 9) will have a net minor, positive impact because they will assist proper implementation of the other management actions even though there could be some inadvertent damage to the plants by the rangers and their vehicles.

Conclusion:

Under the Proposed Action, which assumes that no mineral development will take place, all four of the plant species of concern will receive net minor positive impacts. Benefits from artificial seeding, prescribed burning, and various means of protection from physical harm will be partially counterbalanced by impacts from mineral assessment, fire suppression, and authorized access.

IMPACTS ON UNIQUE VEGETATION COMMUNITIES

Unique vegetation communities (old-growth Douglas fir, Sargent cypress, McNab cypress, and two bogs) in and immediately adjacent to the WSA will receive net minor benefits from increased protection under the Proposed Action. However, no expansion of the existing communities of these species is anticipated. There will be moderate benefits to these communities, especially the bogs, from the acquisition of adjacent lands (Management Action 4) and the resulting protection of acquired habitats. Fire suppression activities (Management Action 5), if they occur, will impact portions of these communities through physical disturbance. However, protection from severe fire damage outweighs the risk of such mechanical damage. Impacts from seasonal no surface occupancy, the ORV closure, Ranger patrols, nonmotorized recreation, and mineral assessment work (Management Actions 6, 8-11) will be as described for Arabis and the three candidate species, above.

Conclusion:

The old-growth Douglas fir, Sargent cypress, McNab cypress, and two bogs will receive net minor benefits from increased protection under the Proposed Action. Impacts from mineral assessment and fire suppression activities will be counterbalanced by benefits from land acquisition and reduced fire hazard.

IMPACTS ON THE STEELHEAD FISHERY IN CEDAR CREEK

Moderate positive impacts on the steelhead fishery in Cedar Creek are anticipated from the spawning habitat improvement project included in Management Action 7 on page 2-3. None of the other management actions will have a measurable impact on the steelhead, although some of them, notably the mineral assessment work (Management Action 11), will lead to a minor increase in siltation and (in the case of the assessment work) heavy metal pollution which could adversely affect the steelhead. Negligible to minor increases in siltation will also be caused by Management Actions 2, 3, 5, 8, and 9. The land acquisitions (Management Action 4) will reduce adverse impacts on steelhead by giving increased protection to (and thus reduced siltation from) the acquired lands. The Ranger patrols themselves will cause a negligible amount of erosion, but their presence will deter other potential sources such as illegal ORV use. Although fire suppression (Management Action 5) is potentially a source of siltation as indicated above, it provides valuable protection from wildfire which could lead to widespread erosion and at least moderate impacts on steelhead. However, it is estimated that major wildfires will happen only infrequently--about once every 25 years.

Consequences

Conclusion:

There will be moderate positive impacts on the steelhead fishery from habitat improvements in Cedar Creek. Negative impacts from siltation from such activities as mining assessment will be mostly unnoticeable and will be counterbalanced by beneficial impacts from such activities as land acquisition and ranger patrols.

IMPACTS ON DRINKING WATER SUPPLIES

None of the management actions on pages 2-1 through 2-3 will have a measurable impact on the drinking water supplies of communities adjacent to the WSA. However, actions that will increase erosion, such as mineral assessment work (see Management Action 11), could impact drinking water supplies. The nature and cause of those impacts will be similar to that of the siltation described in the section on Impacts to the Steelhead Fishery in Cedar Creek, above. Nevertheless, measurable impacts from that siltation and other pollutants that may be worked into the creeks are not anticipated.

Conclusion:

These will be no measurable impact on drinking water supplies.

IMPACTS ON UNIQUE SOILS

The unique soils of the WSA will not be significantly affected by the Proposed Action. What impacts there are will closely mirror the impacts described for the steelhead fishery, above. The management action that will have the greatest impact on unique soils will be the mineral assessment work (Management Action 11) which will be concentrated in the areas of greatest mineral potential (Map 3-3, page 3-14). However, since only a small fraction of 1 percent of this area will be disturbed each year, the unique soils as a whole will not be affected.

Conclusion:

There will be only minor, localized disturbance of the unique soils; as a whole they will not be affected.

IMPACTS ON MINING

The management actions under the Proposed Action will have very little impact on mining within the WSA. Whether or not mining development occurs here depends on the estimated value of the mineral resource and how the Endangered Species Act is applied. See the Appendix for a detailed discussion of this matter.

Mineral assessment work (Management Action 11) is the only mining activity anticipated within the WSA. Fire suppression work (Management Action 5) could provide needed protection for mining assessment equipment and personnel. Having to construct vehicle barriers to protect Arabis plants, the seasonal no surface occupancy, and the "closed" ORV designation (see Management Actions 3, 6, and 8 on pages 2-1 and 2-3) will be inconvenient and add some cost to the assessment work, but will not measurably affect it.

The proposed land acquisition will have little or no impact on mineral development inside or outside the WSA because for the foreseeable future the only way development could be economically feasible will be for the entire resource in that vicinity to be developed.

Conclusion:

The Proposed Action will have no impact on the potential for mining within the WSA. Mineral assessment work will be made slightly more costly and less convenient, but the difference will not be enough to change the amount of assessment work done.

IMPACTS ON THE ENDANGERED PEREGRINE FALCON

The Proposed Action will not be expected to change the population of peregrine falcons (probably one breeding pair) that uses parts of the WSA. The impacts will be small because the population is centered outside the WSA and the WSA constitutes only a small portion (less than 5 percent) of its feeding territory.

Surface disturbance from mining assessment (Management Action 11) and possible fire suppression (Management Action 5) will reduce very slightly the amount of productive habitat available for the falcons. However, the seasonal use restriction on heavy equipment (Management Action 6), plus the acquisitions (Management Action 4) and ORV use restrictions (Management Action 8) will benefit the falcons. The net result will be no impact.

Conclusion:

The Proposed Action will have no measurable impact on the endangered peregrine falcon.

IMPACTS ON AVAILABLE WILDLIFE HABITAT

Only very small changes in the amount and quality of available wildlife habitat involving far less than 1 percent of the WSA will occur under the Proposed Action. Species of primary concern are the river otter, mountain lion, black bear, and spotted owl. None of the populations of these species will be measurably affected. However, there will be some habitat loss (except for river otter) from mining assessment work (Management Action 11) and all of these wildlife species will benefit from fire

suppression (Management Action 5) because of the direct protection it provides to timbered habitat and the "edge" that will be created by fire-breaks. All four species will also benefit from the protection provided by the land acquisitions (Management Action 4) and ORV use restrictions (Management Action 8).

Conclusion:

Although there will be minor positive and negative impacts to wildlife habitat, no changes significant enough to affect wildlife populations will occur.

ADVERSE IMPACTS WHICH CANNOT BE AVOIDED

Unavoidable adverse impacts include impairment of naturalness on a fraction of 1 percent of the WSA from annual mineral assessment work and soil disturbance related to vehicular use particularly from possible fire suppression efforts in the event of a wildfire.

RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Anticipated future uses of the WSA as described by the management actions on pages 2-1 and 2-3 will not measurably impact the basic productivity of the WSA. All options will remain open--either for mineral (or other types of) development or for management as wilderness.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The Proposed Action includes no irreversible or irretrievable commitments of resources.

ALL WILDERNESS ALTERNATIVE

The primary concern under the All Wilderness Alternative relates to the long-term protection of wilderness values and the continuation of mineral assessment work.

IMPACTS ON WILDERNESS VALUES

The wilderness values within the 6,173-acre WSA plus 282 acres of adjacent public lands would receive the special legislative protection provided by wilderness designation. Impacts on the wilderness values of naturalness and opportunities for solitude and primitive and unconfined recreation as well as special features would be essentially the same as under the Proposed Action (see page 4-2) because the management actions are similar under both alternatives. However, there would be even less disturbance of

wilderness values under the All Wilderness Alternative because there would be less use of vehicles and mechanical equipment (see the Management actions on page 2-4).

Conclusion:

The wilderness values within the WSA and some adjacent lands would receive the special legislative protection provided by wilderness designation. Impacts to wilderness values would be similar to those described for the Proposed Action, mainly because annual mineral assessment work would continue, but impacts would be less severe because there would be less use of vehicles and mechanized equipment.

IMPACTS ON THE ENDANGERED PLANT, ARABIS MCDONALDIANA, AND THREE "CANDIDATE PLANT SPECIES" FOR FEDERAL LISTING

Impacts on all four plant species of concern under the All Wilderness Alternative would be the same as those described for the Proposed Action on page 4-3, except that the net result would be slightly more favorable (minor to moderate net positive impacts) because there would be less use of vehicles and mechanical equipment and, thus, less hazard and actual damage to the plants. See the management actions on page 2-4.

Conclusion:

Net benefits to all four plant species of concern would be slightly greater than under the Proposed Action (minor to moderate) because of reduced vehicle use.

IMPACTS ON UNIQUE VEGETATION COMMUNITIES

Impacts on the four unique vegetation communities (old-growth Douglas fir, Sargent cypress, McNab cypress, and two bogs) would be similar to those described for the Proposed Action on page 4-4, except that the result would be slightly more favorable (but still only a minor net positive impact) because there would be less use of vehicles and mechanical equipment and, thus, less hazard and actual damage to the communities.

Conclusion:

Net benefits to the four unique vegetation communities would be slightly greater than under the Proposed Action (minor) because of reduced vehicle use.

IMPACTS ON THE STEELHEAD FISHERY IN CEDAR CREEK

Impacts on the steelhead fishery under the All Wilderness Alternative would be the same as described for the Proposed Action on page 4-4, except that the benefits would be slightly, but probably not measurably, greater because there would be less use of vehicles and mechanical equipment and, thus, less erosion. See the management actions on page 2-4.

Consequences

Conclusion:

Impacts on the steelhead fishery would be the same as described for the Proposed Action, except that there would be slightly less siltation because of reduced vehicle use.

IMPACTS ON DRINKING WATER SUPPLIES

Under the All Wilderness Alternative, impacts on drinking water supplies would be the same as described for the Proposed Action on page 4-5, except that they would be slightly less because there would be less use of vehicles and mechanical equipment and, thus, less erosion. See the management actions on page 2-4.

Conclusion:

Impacts on drinking water supplies would be the same as under the Proposed Action, except that there would be slightly less contamination because there would be less erosion.

IMPACTS ON UNIQUE SOILS

Under the All Wilderness Alternative, impacts on unique soils would be the same as those predicted on page 4-5 for the Proposed Action, except that they would be slightly less because there would be less use of vehicles and mechanical equipment and, thus, less soil disturbance. Mineral assessment work and the impacts from it would be the same as under the Proposed Action.

Conclusion:

Impacts on unique soils would be the same as under the Proposed Action, except that there would be slightly less soil disturbance because of reduced vehicle use.

IMPACTS ON MINING

Under the All Wilderness Alternative, impacts on mining would be the same as those described for the Proposed Action on page 4-5, except that the use of vehicles and heavy equipment would not be allowed. Although vehicle barriers would obviously not have to be constructed (see Management Action 1 on page 2-4), the prohibition against vehicle use would add to the time required for assessment work.

Conclusion:

Impacts on mining would be the same as under the Proposed Action except that there would be the inconvenience of no vehicular access.

IMPACTS ON THE ENDANGERED PEREGRINE FALCON

Under the All Wilderness Alternative, impacts on the endangered peregrine falcon would be even less than under the Proposed Action (see page 4-6), there would be direct disturbance and less habitat disturbance because of the prohibition against vehicular and mechanized equipment use. (See Management Action on page 2-4.)

Conclusion:

There would be virtually no impacts on the endangered peregrine falcon.

IMPACTS ON AVAILABLE WILDLIFE HABITAT

Under the All Wilderness Alternative impacts on available wildlife habitat would be essentially the same as those described for the Proposed Action on page 4-6, except that there would be even less direct disturbance and less habitat disturbance because of the prohibition on the use of vehicles and mechanized equipment.

Conclusion:

Impacts on available wildlife habitat would be essentially the same as under the Proposed Action, except that there would be even less disturbance because of the prohibition against vehicular use.

Chapter 5

Consultation & Coordination

CHAPTER 5

CONSULTATION AND COORDINATION

A considerable amount of consultation and coordination was accomplished as part of the scoping process (see pages 1-3 and 1-4). This chapter is devoted primarily to a presentation of and response to comments received on the draft EIS. Recent coordination with other agencies and consistency with other plans are also discussed.

COORDINATION WITH FISH AND WILDLIFE SERVICE

Informal Section 7 consultation was initiated with the Fish and Wildlife Service (FWS) on May 6, 1986, with regard to all of the WSAs being studied by BLM in California. FWS concurs that formal Section 7 consultation should be deferred until there is a proposal to implement a management action that, in BLM's judgment, may affect a threatened or endangered species. (See memos to and from FWS in the Appendix.)

CONSISTENCY WITH OTHER PLANS

The Red Mountain WSA is entirely within Mendocino County and is classified in the General Plan as public facility (PF) or public lands. General uses allowed under PF include forestry, conservation and development of natural resources, recreation, utility installations, and other public facilities. The WSA is surrounded by land designated Forest Land (FL), Rangeland (RL), and Timber Preserve (TP). Again, general uses include forestry, livestock grazing, agriculture, cottage industries, and recreation. A wilderness designation would be compatible with all of these classifications. Various goals and policies in the General Plan support the protection and preservation of natural areas and the rare and endangered plants. In short, ". . . regulated recreational use of wilderness would be anticipated to be compatible with the area and with applicable goals and policies of the County of Mendocino." (Letter from Mendocino County dated February 17, 1983.)

The Land-Use Element of the General Plan also states that "no permits for large-scale mining of the Red Mountain shall be issued by the county." The assumption in this EIS that no mining development would take place under either alternative (see the Appendix) is, thus, consistent with the General Plan.

No other land use plans would be affected by the proposal and alternative.

DISTRIBUTION OF THE DRAFT EIS

The following agencies, organizations, and individuals received copies of the Draft EIS.

FEDERAL AGENCIES

Army Corps of Engineers, Washington, D.C.
Bureau of Indian Affairs, Washington, D.C.
Bureau of Mines, Spokane, WA
Bureau of Reclamation, Washington, D.C.
Department of Energy, Washington, D.C.
Department of the Air Force, Pentagon, Admiralty, VA
Department of Transportation, Washington, D.C.
Environmental Protection Agency, San Francisco, CA, and Washington, D.C.
Federal Aviation Administration, Washington, D.C.
Federal Energy Regulatory Commission, Washington, D.C.
Federal Highway Administration, Washington, D.C.
Fish and Wildlife Service, Sacramento, CA
Forest Service, Washington, D.C.
Geological Survey, Reston, VA
National Park Service, Washington, D.C.
Soil Conservation Service, Washington, D.C.

STATE AGENCIES

Governor's Office, State Capital, Sacramento, CA
California State Lands Commission, Sacramento, CA
The Resources Agency of California, Sacramento, CA
California Department of Water Resources, Sacramento and Red Bluff, CA
Native American Heritage Commission, Sacramento, CA
California Office of Planning and Research, Sacramento, CA
California State Clearinghouse, Sacramento, CA
California Department of Fish and Game, Sacramento and Ukiah, CA
California Department of Parks and Recreation, Carlotta and Sacramento, CA
Humboldt State University, Arcata, CA

LOCAL AGENCIES

Eureka Chamber of Commerce, Eureka, CA
Leggett Valley Chamber of Commerce, Leggett, CA
Mendocino County Administrative Office, Planning Analysis Division, Ukiah, CA
Mendocino County Board of Supervisors, Ukiah, CA
Yolo County Facilities Department, Woodland, CA

ELECTED OFFICIALS

Douglas H. Bosco, U.S. House of Representatives, Santa Rosa, CA, and Washington, D.C.
Alan Cranston, U.S. Senate, San Francisco, CA, and Washington, D.C.
Dan Hauser, California State Assembly, Sacramento, CA
Ray Johnson, California State Senate, Sacramento, CA
Pete Wilson, U.S. Senate, San Francisco, CA, and Washington, D.C.

ORGANIZATIONS

Audubon Society, Eureka, CA
Bowser Forestry Services, Honeydew, CA
Cahto Coalition, Leggett, CA
California Association of Four-Wheel Drive Clubs, Ukiah, CA
California Federation of Mineralogical Societies, Fort Bragg, CA
California Native Plant Society, Berkeley, Sacramento, Arcata, Davis, and Yorkville, CA
California Wilderness Coalition, Davis, CA
California River Trips, Lotus, CA
Camp St. Michael, Santa Rosa, CA
Career Development Center, Leggett, CA
Citizens For Urban Wilderness Area, Oakland, CA
Chimera Environmentals, Stinson Beach, CA
Coast Federation of Fishermen's Association, Sausalito, CA
Coastal Headwaters Association, Whitethorn, CA
Coastal Mining Company, Carson City, NV
Common Group Reforestation, Phillipsville, CA
Coombs Tree Farms, Inc., Garberville, CA
Covelo Indian Community, Covelo, CA
CRM, Inc., Davis, CA
Czech Lodge, Laytonville, CA
Dean Creek Watershed Association, Garberville, CA
Desert Mountain Tea Company, Whitethorn, CA
Epi-Center, Ukiah, CA
EPIC, Redway, CA
Ecology Center of Southern California, Los Angeles, CA
Erickson Air-Crane Company, Central Point, OR
Forest Lands and Production Coop, Phillipsville, CA
Friends of the Earth, San Francisco, CA
Georgia Pacific Corporation, Fort Bragg, CA
Institute for Traditional Studies, Ukiah, CA
Laterite Correspondence Center, Crescent City, CA
Laytonville Rancheria, Cahto Indian Tribe, Laytonville, CA
Louisiana Pacific Corporation, Ukiah, CA
Mattole Watershed Taxpayers Association, Garberville, CA
Mendocino County Four-Wheel Drive Patrol, Ukiah, CA
Mendocino News Service, Fort Bragg, CA
Minerals Exploration Coalition, Denver, CO
NACENR, Arcata, CA
NW Indian Cemetary Protection Association, Trinidad, CA
Ophir Gopher Jeep Club, Inc., Oroville, CA

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Palomino Estates, Garberville, CA
R and S Financial Services, Inc., Woodland Hills, CA
Red Mountain Association, Piercy and Laytonville, CA
Rex Timber, Inc., Portland, OR
Round Valley Indian Reservation, Covelo, CA
Salmon Trollers Marketing Association, Fort Bragg, CA
Sandeepany West, Piercy, CA
Sherwood Valley Rancheria, Upper Lake, CA
Sierra Club, Fort Bragg, Trinidad, and Sacramento, CA
The Nature Conservancy, Branscomb and San Francisco, CA
Tom Long Watershed Association, Garberville, CA
Ukiah Stone and Gem Club, Redwood Valley, CA
Western Timber Services, Inc., Arcata, CA
Wilderness Society, Trinidad, CA
Willits Four Wheelers, Willits, CA

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Robin and Kathy Taylor, Leggett, CA
Bill Telesmanic, Potter Valley, CA
Jerry Terhune, Miranda, CA
Paul R. Thomas, Petaluma, CA
Donald K. Turman, Rohnert Park, CA
Jay Twigg, Upper Lake, CA
Howard and Olive Twining, Ukiah, CA
Don Ussery, Santa Rosa, CA
Lester VanAtta, Laytonville, CA
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Maria A. Velazquez, Laytonville, CA
Linda Wearne, Laytonville, CA
Greg Wellish, Redway, CA
Dennis R. Weir, Laytonville, CA
Jane Wilson, Piercy, CA
Tom Wodetzki, Albion, CA
Wendy Womon, Redway, CA
Wilbur Wood, Roundup, MO

COMMENTS RECEIVED ON THE DRAFT EIS

A total of 179 oral and written comments were submitted on the Red Mountain draft wilderness environmental impact statement during the 90-day public comment period which ended December 1, 1983. A formal public hearing was held on October 12, 1983, in Redway, California. The hearing was announced through news releases, by personal communication, in notices posted on bulletin boards in the surrounding communities, in public notices published in local newspapers, and in the Federal Register (Vol. 48, No. 174, September 7, 1983).

In accordance with Council on Environmental Quality regulations (40 CFR 1503.4) substantive comments received during the public review period of the draft EIS, and the responses to those comments, are included on the following pages.

While 120 written comments were received, many only remarked on the recommendation without providing new data or comments on issues bearing directly on the EIS or the impacts of the alternatives. Nonsubstantive comments are consolidated for use in the wilderness study report but are not included in this document.

The transcript of the public hearing was also analyzed for substance regarding the adequacy of the EIS. Again, most comments were not substantive enough to require inclusion in the final EIS, but were consolidated as support for or against wilderness in the study report.

GENERAL RESPONSE TO THE COMMENTS

Virtually all of the comments referred to the value of the minerals, questioned the use of the term "valid mining claims," or demanded a resolution of the mining "issue." The following discussion is provided to clarify the term "valid claim" and "valid existing rights" and how they relate to potential mining at Red Mountain.

A "valid claim" is one that has been properly filed, has its annual assessment work completed and documented, and includes a discovery that will pass the "prudent man test." "Valid existing rights" refer to valid claims that occur within WSAs, were located on or before October 21, 1976, and can pass the "prudent man test" as of October 21, 1976, and at the time of approval of a Plan of Operations (USDI, Bureau of Land Management, "Interim Management Policy and Guidelines for Land Under Wilderness Review (revised July 12, 1983), page 26).

RESPONSE TO SELECTED INDIVIDUAL LETTERS

The comment letters which follow (see Table 5-1) include the substantive comments requiring clarification or corrections in the final, and are indicative of the comments received at the public hearing. The letters are immediately followed by the Bureau's response.

Table 5-1

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COMMENT LETTER 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

NOV 3 0 1983

Van W. Manning
District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482-0940

Dear Mr. Manning:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled PRELIMINARY WILDERNESS RECOMMENDATIONS FOR RED MOUNTAIN WILDERNESS STUDY AREA, MENDOCINO COUNTY, CALIFORNIA. We have the enclosed comments regarding this Draft EIS.

We have classified this DEIS as category LO-1 (lack of objections - adequate EIS). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical and
Resources Management

Enclosure (1)

Pesticides Comments

A The FEIS should state whether or not any pesticides (e.g., herbicides, insecticides, rodenticides, fungicides, etc.) will be used for vegetation clearance or control, maintenance operations, or the control of mosquito or other vector populations. If so, the types of pesticides, application rates, and application procedures should be addressed. Any pesticides used must be registered with the Environmental Protection Agency and the State and label directions and instructions followed. All applicable State regulations must also be followed. In addition, because the regulatory status of chemicals is constantly changing, EPA recommends that a periodic review of the chemical's current regulatory status be done prior to application. Should pesticides be used, EPA recommends that a specific section of the FEIS be devoted to the subject.

RESPONSE TO COMMENT LETTER 1

A. No use of pesticides is anticipated within the WSA. Any site-specific projects involving pesticides or earth-disturbing activities would require an environmental analysis and all appropriate permits.

COMMENT LETTER 2

TELEPHONE
(707) 468-4221

COUNTY OF MENDOCINO
BOARD OF SUPERVISORS
COURTHOUSE
UKIAH, CALIFORNIA 95482

December 13, 1983

Van W. Manning, District Manager
Bureau of Land Management
555 Leslie Street
Ukiah, CA 95482

Dear Mr. Manning:

A The Mendocino County Board of Supervisors has asked that I write to express our support of the BLM position calling for no logging in the Red Mountain area. The Board feels that the third alternative that has been discussed, that of the creation of a research natural area--area of critical environmental concern, be adopted.

We would also like to assure that you are aware that the General Plan comments on this area indicates that mining would not be an approved zoning activity. The plan reads that, "No permits for large-scale mining of the Red Mountains shall be issued by the County." (Mineral Code Goals and Policies; Policy Number 2f.)

The attached minute order provides you documented evidence of the Board activity. The action specifies that the Board recommends no logging in this area. We appreciate your taking our feelings into consideration in the this discussion.

Very truly yours,

John Cimolino

John Cimolino
Supervisor, Fourth District

MPG/et

5-13

THE BOARD OF SUPERVISORS

MARILYN J. BUTCHER, FIRST DISTRICT
DAN HAMBURG, SECOND DISTRICT
JIM EDDIE, THIRD DISTRICT
JOHN CIMOLINO, FOURTH DISTRICT
NORMAN L. de VALL, FIFTH DISTRICT

171.

8a. RED MOUNTAIN DRAFT EIS
Planning Department comments were received, and the following individuals addressed the issue: Stan Whitmarsh, preparer of the EIS; Michael Huddleston, representing Copper Coalition; Ken Diamond; Tom O'Neil, Secretary of EPIC, and Ted Ericksen.

Upon motion by Supervisor Cimolino, seconded by Supervisor Butcher, and carried, IT IS ORDERED that the Chairman is authorized to write a letter recommending the third alternative -- Research natural area - Area of Critical Environmental Concern; said letter to also include a strong recommendation that no logging occur in this area, including the 400 acres. October 1983
Vote on Roll Call:
AYES: Supervisors Butcher, Eddie, Cimolino
NOES: Supervisors de Vall and Hamburg
ABSENT: None

Supervisor Cimolino indicated he will attend the public hearing and convey the county's position.

RECESS 9:25 - 9:40

9. COUNTY COUNSEL
9b. Ordinance Prohibiting the Creation & Expansion of Overnight Visitor Serving Facilities & the Issuance of Licenses & Permits in the Mendocino Town Plan Boundaries
County Counsel Klein reviewed the changes made in this Ordinance. The following spoke in opposition to the proposed amendment: Bob Richmond, Margaret Ball, Ina Karish, Helen Brenanstal, Harry Perkins, and Bud Kamb. Mike Beeson & Sylvia Coddington spoke in favor of the proposed amendment. Correspondence and a listing of telephone callers were routed to the Board.

Upon motion by Supervisor de Vall, seconded by Supervisor Eddie, and carried, IT IS ORDERED that the reading of the text of the Ordinance is waived.

Moved by Supervisor de Vall, seconded by Supervisor Hamburg (Vice-Chairman Cimolino presiding) that the proposed Ordinance be adopted.
Vote on Roll Call:
AYES: Supervisors Hamburg and de Vall
NOES: Supervisors Butcher, Eddie, Cimolino
ABSENT: None
MOTION FAILED. Supervisor Hamburg resumed the Chair.

LUNCH 12:05 - 1:30. SUPERVISOR de VALL TEMPORARILY ABSENT.

11. DEPARTMENT OF PUBLIC WORKS October 1983
Consent Calendar
Upon motion by Supervisor Eddie, seconded by Supervisor Cimolino, and carried, IT IS ORDERED that the following two items on the Public Works consent calendar are approved as recommended by the Director:

11a. Approval of Parcel Map for Oman, MS 6 - 83

RESOLUTION NO. 83-292

RESOLUTION OF THE MENDOCINO COUNTY BOARD OF SUPERVISORS IN THE MATTER OF ACCEPTANCE OF MINOR SUBDIVISION #6-83 FOR RONALD OMAN, ET AL

(Resolution No. 83-283 filed in Resolution Book #32 and is incorporated herein by reference and made a part hereof as though set forth herein verbatim.);

11b. Approval of Parcel Map for Kennedy, MS 21-83

RESOLUTION NO. 83-293

RESOLUTION OF THE MENDOCINO COUNTY BOARD OF SUPERVISORS IN THE MATTER OF ACCEPTANCE OF MINOR SUBDIVISION NO. 21-83 FOR BOBBY KENNEDY October 1983

(Resolution No. 83-284 filed in Resolution Book #32 and is incorporated herein by reference and made a part hereof as though set forth herein verbatim.)

Vote on Roll Call on the Preceding Consent Calendar Items:
AYES: Supervisors Butcher, Eddie, Cimolino, Hamburg
NOES: None
ABSENT: Supervisor de Vall

11c. Receipt of Bids, Acceptance of Proposal & Award of Contract for Emergency Storm Damage Repairs to Deerwood Drive Ext.
Mr. Campbell advised that two bids were received for this project and both were over the engineer's estimate. The alternatives were reviewed. Upon motion by Supervisor Eddie, seconded by Supervisor Butcher, and carried, IT IS ORDERED that the bids are received and taken under advisement.

11d. Refuse Disposal Fees to Become Effective 12/1/83
Public Works Director Campbell submitted a proposed revised fee schedule representing the Board's previous direction, and a time table for implementing the revised fees.

SUPERVISOR de VALL RETURNED.

Upon motion by Supervisor de Vall, seconded by Supervisor Butcher, and carried, IT IS ORDERED that the Board concurs in proceeding with the revised rates and sets October 25, 2:00 p.m. as the hearing date. October 1983
Vote on Roll Call:
AYES: Supervisors Butcher, Eddie, Hamburg
NOES: Supervisor Cimolino
ABSENT: None

The foregoing instrument is a correct copy of the original on file in this office
ATTEST:
JOYCE A. BEARD Clerk of the Board of Supervisors of the County of Mendocino, State of California
By: Virginia Goodacre Deputy

RESPONSE TO COMMENT LETTER 2

A. No timber sales are scheduled in the 10-year Timber Sale Plan within the WSA. However, one sale is planned for 100 acres within the ACEC but outside the WSA. The ACEC Record of Decision (1984) prohibits timber harvest on 810 acres of old-growth Douglas fir habitat. Management actions for the WSA under both alternatives (wilderness designation and non-designation) are detailed in Chapter 2. The RNA/ACEC has already been established and is part of the Proposed Action.

COMMENT LETTER 3

CAHTO COALITION
Star Route 2 Box 100
Leggett, California
95455

District Manager
Bureau of Land Management
P.O. Box 940
Ukiah, California, 95482
(RE: Red Mt. Draft E.I.S.)

Dear Mr. Van Manning,

We would like to add additional comments concerning the Draft E.I.S. for Red Mt. WSA, which should be review in conjuction with our testimony at the public hearing in Redway, Calif.. If these comments are publised for public review please include the transcript of our comments given in Redway.

The Draft EIS while containing ample examples of impacts a wilderness designation would have on other resources, it lacks any consideration of the proposed timber harvesting on an ACEC/RNA. This is especially important factor in an analysis that is suppose to fully disclose the enviromental effects of a Federal decision. While we do not expect the BLM to engage in speculation on remote possibilities of what adverse effects a timber harvest will have on natural values and wilderness resources, we do expect the obvious consequences to be presented. The BLM Draft EIS on SYU 13, points out that regardless of the method employed, timber harvesting impacts irreversibly and irretrievably the natural values that constitute a natural area. The Draft EIS never considers the effects of timber harvesting on future opportunities for wilderness classification, namely, the effects on the benchmark characteristics idenified in the Wilderness Act. If the BLM is willing to forego wilderness values, without even considering a reasonable alternitive such as ACEC/RNA without logging, it must at least clearly describe in detail what it is proposing to give up. Uncertianty as to the future course of development, is no excuse for abandoning enviromental analysis, especially when irreversible and irreterivalble commitments of resources are being made. The National Enviromental Policy Act which requries the BLM to perform the duty of compiling an EIS, is a deliberate command to consider enviromental factors and not shunt them aside in the bureaucratic shuffle. This allows Congress and the public that the BLM has taken a hard look at enviromental factors by identifying and duscussing all foreseeable enviromental consequences.

A

The lack of assesing the impacts on natural and wilderness values in the proposed ACEC/RNA designation by timber harvesting does not satisfy the mandates of NEPA. The deletion of the reasonable alternitive of ACEC/RNA without timber harvesting is never explained. Since it is not only reasonable but also an obvious alternitive between wilderness and the proposed action, we must conclude that this does not satisfy the intent and purpose of an EIS.

The BLM's opinion thet the mining claims are valid are patently false, because these claims do not meet the prudent man test, for the mining of Red Mt. is economically unprofitable. The market for critical and strategic metals is glutted and the closure of the Riddle Mine in Oregon is obvious evidence to the unprofitablity of these claims. Such biased opinions in favor of the developement of one resource that would permanently and seriously degrade all other resources is

B

not in the best intrest of the public or the management of public lands. A sanction like this that validates clearly invalid claims cannot be labeled as mere administrative deferance, for it lacks competent rationales and is inherently arbitrary in nature.

The use of adverse effects of possible mining on Red Mt. in deciding against a suitable wilderness designation, in conjuction with the blm's validation of mining claims and proposed timber harvesting indicates to us the lack of serious considerations of the natural and wilderness values of Red Mt. by the BLM. Instead the BLM has valued the minerals and timber above the value of its wilderness resources without fully disclosing how it has valued them or what it is proposing to give up, in developing timber and mineral resources.

Therefore, we strongly reccomend that the BLM once again submitt a new draft EIS that deals squarely and fairly with the important issues involved in the review of Public Lands for wilderness resources that also satisfies the mandates of NEPA.

On behalf of the members of the Cahto Coalition I wish to thank you for your consideration of these comments that I have presented on their behalf.

Sincerely,

Michael Huddleston

Michael Huddleston, Chairman

RESPONSE TO COMMENT LETTER 3

A. See response to Comment A of Letter 2.

B. BLM now assumes that mining will not take place under either alternative (all wilderness or no wilderness) because of conflicts with the Endangered Species Act. See the Appendix for a full explanation. Also see the General Response to Comments on page 5-8.

COMMENT LETTER 4

COASTAL MINING COMPANY

Subsidiary of THE HANNA MINING COMPANY

333 South Carson Meadowa Drive #44
Carson City, Nevada 89701
702-883-9651

November 22, 1983

Mr. Stan Whitmarsh
District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482-0940

Dear Stan:

Please submit the enclosed letter as our official statement concerning the Red Mountain WSA-050-132.

We have requested that several other parties submit similar letters to you, hopefully prior to the December 1 deadline. We do ask that you read the letter and notice the attached interoffice BLM memorandum pointing out the disposition of this same problem in Oregon.

We appreciate having this opportunity to respond to your WSA and ask again that you give careful thought to your recommendation.

Very truly yours,

C. A. Dowd

C. A. Dowd
Vice President

CAD/lb
encl.

5-17

COASTAL MINING COMPANY

100 ERIEVIEW PLAZA
CLEVELAND, OHIO 44114

November 22, 1983

District Mansger
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, California 95482-0940

Re: Draft Environmental Impact Statement
Red Mountain Wilderness Study Area

Dear Sir:

Becsuse of its recognized interest in the above, Cosstal Mining Company, a subsidisry of The Hanna Mining Company is submitting its comments for your considertion to sssist in preparing the final environmental impact statement for the Red Mountain Wilderness Study Area (the "Area"). Coastsl and Hanna wish to commend the Bureau for its description of the management alternatives of the Area as well as the discussion of resource trade offs involved in designating the Area as wilderness. The Bureau has attempted to present a fair and accurate picture of the affected environment and the environmental consequences of the three proposed management alternatives. Where we differ with the Bureau's approach, however, is in the interpretation of those environmental consequences and the recommendation on how best to deal with them. Also, we take exception to what we believe is the Bureau's failure to adequately consider alternatives apart from those it has suggested.

A1 We certainly agree with the Bureau that the Area is unsuited for wilderness designation. The Area simply does not meet the necessary wilderness criteria or contain the requisite wilderness characteristics as prescribed by lsw. As such the proper issue to be addressed is to what extent, if any, the Area should be protected apart from the current multiple-use management framework.

A In this regard we believe that the Bureau's proposed action to designate the Area as a Research Natural Area and an Area of Critical Environmental Concern is unwarranted. In so stating we do not mean to imply that the Ares does not contain important values. These values need to and csn be protected under existing statutes, regulations and guidelines. Such a designation, however, unfortunately does not fully recognize the mineral value in the Area and would place greater burdens on our ability to develop the strategic minersls present. Because of this, we feel that the Ares, while containing important values, is not so unique as to warrant the proposed action.

A Nor is such an action warranted by law since Coastal Mining's claims pre-date the legislation authorizing the establishment of Areas of Critical Environmental Concern. Coastal has valid existing rights in the Area which must not be preempted through administrative action. We recommend that the Bureau reconsider their proposal in light of such pre-existing rights and believe that upon so doing, it will agree that the management program for the Area must not unduly hinder mineral development and should at most continue to be managed under the existing multiple-use management guidelines.

B It should be pointed out that the Bureau recently faced a situation very similar to the present one. Specifically, the Hunter Creek bog and springs in Oregon recently was not declared an Area of Critical Environmental Concern for precisely the reasons we have now expressed; i.e. the Bureau ruled that the mining claims within the area predated the Federal Land Policy and Management Act and Endangered Species Act and thus took precedence over any designation which would adveraely impact on the mining or mining-related activities thereunder. (see attached memorandum of May 27, 1983 from the Bureau's Oregon state office). Because of the similarity of Hunter Creek with the present situation, we do not see how the Bureau can now come to a different conclusion. If, however, the Bureau does reach a different conclusion, we request that it provide a full discussion on such action in the impact statement in order that we can clearly determine the Bureau's rationale for altering its position.

C The Bureau has also failed to include an additional alternative for management of the area which we believe must be considered in the environmental impact statement. We believe the Bureau is remiss in not paying heed to its own Mineral Resources Policy included in Appendix 3.1 of the Draft and failing to fully recognize the mineral potential of the Area. In response to the notice appearing in the December 3, 1982 Federal Register, we have previously suggested to the Bureau that the Area be declared an Area of Critical Mineral Potential. We felt then, as we do now, that the Area is an important asset to aid in safeguarding our national interests. It must not be burdened with additional constraints which will add to the costs in developing the mineral values in the Area. As above, we believe discussion regarding this matter should be included in the impact statement to ensure that all sides are assured that they have received a fair hearing.

Although we have spoken on this in the past, it is important to once again reiterate our position with regard to the possible mining in the Area. There is no dispute that this Area contains valuable strategic minerals which may some day be developed. When this day will come is yet unpredictable, especially in light of the current depressed economic state of the minerals industry in general and the nickel industry in particular. However, should that day come, we will operate in full compliance with all the then existing environmental and reclamation laws and regulations. Hanna takes pride in its history of corporate responsibility and concern for the environment wherever

it has operated. We would continue this policy here. Our concern is that we will be precluded from having the opportunity to develop our property due to what we believe are unwarranted constrainta on the eventual operation. We ask that you consider our views in your decision making process and thank you for the opportunity to express them.

Very truly yours,

C. A. Dowd

C. A. Dowd
Vice President

SEM/ark
Attachment

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

OREGON STATE OFFICE
P.O. Box 2965 (825 N.E. Multnomah Street)
Portland, Oregon 97208

IN REPLY REFER TO
1608 (935)

	Initials /date
DM	
ADM	
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MAM	
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MAY 2 7 1983

Memorandum

To: District Manager, Coos Bay

From: State Director, Oregon

Subject: Review of District Evaluation and Recommendation for the Proposed Hunter Creek Botanical Area

The Division of Landa and Renewable Resources haa reviewed your May 18, 1983 evaluation and recommendations of the proposed Hunter Creek Botanical Area of Critical Environmental Concern (ACEC). This evaluation was prepared in accordance with the June 1980, ACEC Policy and Procedurea Guidelines and various State Office directives and guidance. The evaluation appears complete and technically acceptable by current standards. We have no substantive suggestions for improvement. It should be incorporated into your land use plan permanent records.

The recommendation to not designate the area as an ACEC is based on the finding that the area does not meet the August 7, 1979, 43 CFR 1601. 5-4 (b)(4) "protectability" standard, which requires that "The value, resource, system or process shall be capable of being protected from decisive adverse change with the special management attention that can feasibly be applied." The filing dates on the mining claims pre-date both the Endangered Species Act (1972) and the Federal Land Policy Management Act (1976), and therefore, constitute pre-existing rights. The May 5, 1983 Federal Register amendments to the Bureau's planning regulations included revised ACEC criteria (43 CFR 1610.7-2 (a)) of relevance and importance only. These regulations are expected to become effective July 5, 1983. Although "protectability" is no longer a criterion for ACEC identification, it is clear that designation would be a futile exercise if the Bureau does not have the authority to significantly restrict or prohibit mining or mining-related surface disturbing activities. I concur with your recommendation that the area not be designated an ACEC. In addition, I feel that your conclusion would be appropriate under the revised planning regulations.

I assume that you will take appropriate steps to notify the nominators and other interested parties of your decision and my concurrence. Please keep me informed of the results of your consultation with the U.S. Fish and Wildlife Service and of any mining claimant plans of operation which are submitted for the area. Since this evaluation and recommendation to reject the ACEC nomination is an inventory-type decision, it is not protestable under the planning regulations. The decision could be protested and appealed under 43 CFR Part 4. However, I believe your analysis clearly shows that the Bureau lacks the authority to take a stronger protection-oriented position at this time.

William D. Lawrence

RESPONSE TO COMMENT LETTER 4

A[1]. Although the BLM recommends for the reasons stated on page 1-7 that this WSA not be designated wilderness, it does, as determined through the inventory process, contain the requisite wilderness characteristics as prescribed by law.

A. The Red Mountain RNA/ACEC was established in 1984. Its designation of the Red Mountain RNA/ACEC makes likely some restrictions on use of mechanical equipment, but does not entirely prohibit its use, nor preclude annual assessment work required to maintain mining claims. It is predicted, however, that mineral development will not occur within the WSA (See Appendix).

B. The Ukiah District is unfamiliar with all of the details of the Hunter Creek bog decision.

The State Director of California has recognized many ACECs in the California Desert National Conservation Area which have mining claims. However, any mining at Red Mountain must meet the requirements of the Endangered Species Act. Such a designation gives Red Mountain the recognition it deserves, and has had within the scientific community for a century. The designation of the Research Natural Area/ACEC emphasizes the wealth of data which can be obtained before mining begins. The Bureau is currently funding research and encourages other scientific entities to study the features of Red Mountain.

C. Recognition of Red Mountain as an Area of Critical Mineral Potential is not an alternative vis-à-vis wilderness. The term area of critical mineral potential has no legal meaning, but was intended to encourage mineral developers to alert the BLM to areas of high mineral potential for use in various studies and withdrawal review.

COMMENT LETTER 5

Environmental Protection
Information Center, Inc.

P.O. Box 397
Garberville, CA 95440
Office in Ruby Valley

4 December 1983
(707) 923-2931

For the permanent record

Van Manning
Jack Lahr
Stan Whitmarsh
Bureau of Land Management
Box 940
Ukiah, California 95482

Dear friends,

The following is the promised supplement to our verbal comments on the Draft EIS for the Red Mountain wilderness study. Thank you for agreeing to accept these comments late. I greatly appreciate your friendly and courteous attitude, and I compliment you for the effort BLM has made to obtain public input. In my opinion it has been a genuinely excellent effort.

The DEIS was clearly readable and contained far fewer internal contradictions than did the SYU-13 EIS. Unfortunately the clarity has often been achieved through conclusory and otherwise superficial treatment, even of the most important parts. I find that apart from some faulty reasoning in the DEIS that the reliance on oversimplified discussions and conclusory judgements is the major insufficiency of the document.

A I would like to say at the outset that I'm tired of the confusion perpetuated in the DEIS concerning "valid claims" and "valid existing rights". There is a world of difference between these and their correct meanings derive from the basic legal authorities and well established case law. Yet they continue to be used interchangeably. This lack of care (or understanding?) fosters the defective notion that Red Mountain will almost certainly be mined. If instead you were to focus on the extremely low quality of the ore deposit and the significant legal encumbrances to any mining the DEIS reviewers would be compelled to an opposite conclusion.

B "Valid claims" are very difficult to establish and fewer than ten claims go to patent in the U.S. each year. This is because most mining claims are not economic and were based on wishful speculation. And large corporations like Hanna are not above such speculation - it is frequent in the industry. The claims at Red Mountain have not been established as "valid claims".

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C So what "valid existing rights" (FLPMA Sec. 701(h)) does Hanna have? ONLY the "foothold" rights. If Hanna's claims are properly recorded and maintained, the foothold rights will prevent others from jumping their claims. That's all. Those Red Mountain claims do not guarantee any right to mine unless they are "valid". They have never been shown to be valid. And even BLM's public hand-out pamphlets on mining law explain that foothold rights are of no value against the U.S. Government. These rights then cannot in any way be used by the claim holder to prevent a wilderness designation, nor can they be properly used by BLM to color a recommendation as to an area's suitability for wilderness designation. Congress will be well aware those claims are there and Congress has already made ample provision for mining irrespective of whether an area is or is not designated as wilderness.

D A typical example of the confused and misleading "validity" statements occurs at DEIS p. 4-1. The text claims that "...mining could legally proceed on valid existing mining rights..." This assertion is not true. The valid existing rights at Red Mountain are not mining rights, they are merely foothold rights, and mining cannot necessarily proceed from them. Some other glaring examples of this confusion occur at pp. 4-5 and 2-9. Mining is not a valid existing right.

BLM cannot reasonably well judge that the Red Mountain claims signal that the mountain will one day be mined.BLM assumes upon a very poor showing of evidence that the claims render unreasonable any proposal the area can be managed as wilderness. BLM's judgement here is highly conclusory, yet it is central to the choice of preferred alternative. The conclusory nature of this judgement is in violation of BLM regulations and the NEPA regulations. The body of evidence that any decisionmaker must have to support BLM's central conclusion regarding manageability is not given in the DEIS. How can this be adequate?

Every single mining claim at Red Mountain must pass the "prudent man test" on its own merits. Bureau of Mines surveys there show clearly that the claims vary greatly in ore quality, and thus some claims are much more likely to fail the test than others. Under the court tests the ore body is not treated as one claim. Given the wide variations between the many claims, the simplistic conclusion that all the claims are valid (p. 4-3) is more than can be reasonably accepted, and it ignores the large body of mining law as well as its complexities.

F It is likely that to be economically feasible a mining operation would have to include both the private and public lands (pp. 4-2,4-4). It is also likely that most public lands claims must be economic, so why is there no evaluation of the great variation in the ore quality? The oversimplified treatment in the DEIS ignores the ruling relevance of mining law by seeming to regard the entire ore body as a single and uniform claim.

G Why too is no serious consideration given the fact that large-scale mining of the private lands would be illegal (pp. 3-17,4-2)? Is BLM presuming that a big corporation like Hanna is so powerful that they can overrule local government? Instead, if BLM regards the local law with respect, why does BLM continue to consider that the claims would be economic even when private lands can't be mined? Again, DEIS states mining is not likely to be economic if it does not also include the private lands (pp. 4-2,4-4). If the claims are not economic, they are not valid pursuant to the law and they cannot be mined.

H Too, BLM stated at the South Leggett meeting that they expected some of the claims could not be mined because of conflicts with endangered species. The subtraction of such claims or parts thereof further reduces the likelihood of economic return, and further reduces the possibility that any claims are valid.

I Too, BLM's portrayal that the Red Mountain claims are rich is both misleading and wrong. For example, at p. 2-9 the Red Mountain deposit is stated to be one of the three largest deposits of nickel, cobalt, and chromium in the nation. This statement derives directly from a Bureau of Mines finding, or indirectly from a Hanna employee's comment based upon that finding. But that finding referred only to its being in the top three largest in a total sample of only ten, from only in the western U.S., and of only laterite deposits. These are major qualifications. Both nickel and cobalt occur with other ores than laterites and major domestic sources not used in the Bureau of Mines comparisons occur in Idaho and Missouri, among others. Even in California nickel has been mined from various nickel sulfide deposits, which again were not used in the Bureau of Mines comparisons. Too, many known laterite deposites of Oregon and California were not even used in the comparisons. In short, there is no factual justification for the assertion in the DEIS.

And what is the quality of Red Mountain ores? The Bureau of Mines "Minerals Availability Classification System" reports the chromite deposites are too small and irregularly deposited to supply any large demand. And the Red Mountain GEM Report presents that cobalt values are "very low". Nickel at Red Mountain is said to average about 0.8%, but compare that to major laterite deposites of Africa which average 14% nickel. Even the Hanna mine at Riddle, Oregon, which averages 1.0% nickel, is closed because it is not economic. How, then, can the BLM judge that the claims are valid when in order to be valid they must be economic? J

By showing here that BLM's conclusions about validity in the DEIS are dubious, I mean to show that BLM has not presented adequate information to provide the decisionmaker an adequate tool. And I show also that the major judgements and recommendations of the DEIS are based upon conclusory statements that are not supported by the text of the document. K

I would add my belief that BLM's attempt to award to Hanna the benefits of a claim validation proceeding (the reward of "no wilderness", which the DEIS admits is indirectly also an economic reward, is awarded because of "valid claims") without going through the formal legal procedure of claim validation denies me and the environmental group I represent our rights to due process of law. The conclusions in the DEIS accomplish a de-facto validation of the claims. L

M Based on the definitions provided in the DEIS (p. A-2), it is not possible to term a mineral as both "strategic" and "critical". Yet the DEIS does so. Too, the issue of "strategic" minerals is a hobgoblin. Most of our nickel is imported from Canada. And now in recent years so too is most of our cobalt. In fact, a newly discovered deposit in British Columbia is expected to provide for all North American needs for the foreseeable future. It is not realistic to see reliance on Canadian supplies as being a threat to American security.

Too, if the U.S. government were genuinely concerned (beyond merely trying to further big business), it would forbid U.S. companies from selling our stocks of strategic minerals to communist nations. It doesn't. And as long as foreign supplies are so freely available, the government if genuinely concerned would encourage domestic supplies to be left as in-ground reserves. But it doesn't. The notion of "strategic" and "critical" minerals then in this case has nothing to do with national security and it should be dropped from the DEIS as misleading and irrelevant.

On p. 2-4 the DEIS says that mining on Little Red would negatively impact the Red Mountain wilderness, but the important qualifier that mining of Little Red is unlikely anyhow if Red Mountain is also not mined (pp. 4-2,4-4) should have been added here too. Further, the subject should have been illucidated with Hanna's own comments. These were sent to the Acting District Manager in a letter of 2 February 1983. According to that letter, "A wilderness designation most certainly will deny access and prohibit mining within the study area, and effectively prohibit any mining of private areas next to the wilderness area." Since the claim holder is most certain of this, how can the DEIS imply then, as it does, that wilderness designation is unwise because Little Red still could be mined anyhow?

O

Too, given Hanna's statement that wilderness designation most certainly will prohibit mining of the study area, how can BLM offer the major opposite conclusion, that mining can occur even with wilderness designation? Their contrary view carries considerable weight and the issue is extremely significant to the purposes of the DEIS. Therefore I here incorporate by reference as a part of this comment letter that letter of 2 February, and I attach acopy of it. Their statement - and BLM's failure to report it in the DEIS - supports my view that BLM has not acted in good faith in this DEIS.

I have visited many California wilderness areas and I have visited Red Mountain many times. Thus I find the conclusion in the DEIS that the area is low in quality of traditional wilderness values (pp. 2-1,2-9,2-10) to be surprising and in disagreement with my experience. I recently escorted Jim Eaton of the California Wilderness Coalition to Red Mountain because he has more experience in this subject than perhaps anyone else in California. Jim strongly agreed with my assessment that the area clearly has outstanding wilderness values.

By contrast, the DEIS presents no basis for its conclusory judgements about the low quality of wilderness values (pp. 2-1,2-9,2-10,3-1). This is especially interesting because BLM's Final Intensive Inventory (at page 163) discusses Red Mountain's traditional wilderness values as being "outstanding". Since these qualities have been clearly identified by BLM as "outstanding", it is very inappropriate to imply otherwise. There is no call to assess which candidate areas are "most outstanding" or to make further such subjective comparisons. Is the area a fully qualified candidate for wilderness? It is, according to the purposes of the Inventory. Yet the DEIS has even failed to mention the discussions in the Inventory.

P

The list of alternatives in the DEIS is inappropriately short. Surely there are other major options to consider. Even the BLM regulations (Manual Section 1792.44E8a) spell out broad possibilities such as delayed implementation. What if the claims are formally found invalid? Because of the "no wilderness" recommendation, there is no alternative by which the area could lated be designated, for example. Too, the Mendocino Board of Supervisors recommended an alternative not given in the DEIS.

Q

Your socioeconomic impact analysis is exceptionally inadequate. Whoever wrote it has little or no understanding of socioeconomics. The DEIS glibly ignores that the cost-benefit flow, leakage, and especially the huge externalities render transient mining oper-tions into a net DRAIN on local economies. The taxes generated by such boom-and-bust operations never compensate even lergely for the greatly increased costs to local government. The DEIS thus perpetuates major and dangerous socioeconomic myths about transient mining. Too, this is yet another DEIS in which we get relatively lots of "-economics" but next to no "socio-". This is not an adequate satisfaction of legal mandates. Please discuss the social costs of mining versus wilderness. They are actually of enormous significance to our area. Please withdraw the entire section on p. 4-4 and have a fully qualified person rewrite it.

Q'

It should be noted that the Bureau of Mines is not an objective source of information. That agency actively advocates for the mining industry. In regard to Red Mountain, the assessment by James Ridenour of the environmental impacts of the proposed Red Mountain mining operation is conspicuously prejudiced. I attach a copy including the cover sheet. Please consider it part of this comment letter.

The DEIS fails to underscore adequately the significance of the scientific resource at Red Mountain. The area is essentially yet unresearched. Numerous unnamed species quite possibly are endemic there, and obviously exceptional ecological relationships are unexplored. Dr. Jenny has pointed out the significance of the ecological relationships to forestry and his comments (which you have) bear repeating. After all, under present DEIS alternatives the only way this significance to forestry can be properly preserved for study is under a wilderness designation, the only alternative without logging.

R The DEIS errs at p. 3-17 in asserting there is no logging of old growth reserves. Not only would they be logged in rotation with other old growth, they would also be "managed", a euphemism for on-going selection cuts.

S The CNPS listing of rare plants is greatly changed in the current (April 1980) edition of their list. Thus please update the DEIS at p. 3-17. The DEIS also errs at p. 4-1: While officially endangered plant species are protected, the Endangered Species Act does not protect any other rare species. Only Wilderness designation would best protect all the other unlisted species which occur only at Red Mountain, and yet this important aspect is unmentioned in the Botanical Resources section (p. 4-2).

T The statement about recreation development under Alternative 1 (p. 4-3) contradicts similar statements elsewhere in the DEIS (pp. 2-2,2-8).

The word "ultramafic" is consistently misspelled.

I also concur with and incorporate by reference the excellent comments of Johanna Wald.

Incidently, "Coastal Mining Company" is not the claim holder at Red Mountain. Coastal Mining Company quitclaimed all those claims to Coastal Mining Company of California. Both companies are wholly-owned subsidiaries of Hanna Mining and both are Delaware corporations. BLM State Office has a copy of the quitclaim.

Thank you for considering these comments. Please continue to keep me fully and timely informed.

Sincerely,

Robert Sutherland.

cc:
J. Wald
others

COASTAL MINING COMPANY
Subsidiary of THE HANNA MINING COMPANY
333 South Carson Meadows Drive #44
Carson City, Nevada 89701
702-883-9651

February 2, 1983

Re: Red Mountain WSA
No. CA-050-132
Wilderness Study
Environmental Impact
Analysis

Mr. Edwin G. Katlas
Acting District Manager
Ukiah District Office
Bureau of Land Management
P. O. Box 940
Ukiah, California 95482-0940

Dear Mr. Katlas:

In response to your December 21, 1982, letter and subsequent to our recent phone conversation, I submit that Coastal is adamantly opposed to a wilderness designation for the above mentioned WSA. Coastal already has spent much time and money considering the issue, and it seems clear that such a designation would hinder its rights in the area and also would have a negative impact on the mining potential of a strategically important mineral.

We further wish to submit the following observations and comments in support of Coastal's position:

(1) The subject wilderness study has continued for approximately five years during which Coastal has responded to several inquiries by the BLM and submitted detailed maps and a statement in March 1979 regarding Coastal's exploration and development project on Big & Little Red Mountain. Coastal has had one "letter to the editor" published. Coastal has served on an advisory committee for the study and gave testimony opposing wilderness designation at a March 30, 1979, hearing in Leggit.

(2) The Bureau of Mines office of Spokane, Washington, under a separate independent nationwide study of Nickel Laterites, secured 189 surface and bore hole samples of the area, had the samples chemically analyzed for nickel, cobalt and chrome, and concluded that the area in question was the best source of nickel laterite remaining in the United States of the 10 areas studied. Upon request, the Bureau is prepared to submit a general statement of its findings.

(3) Work on ore upgrading is continuing. Several companies in the Del Norte County-Gasquet area report confidence in processes that point toward commercially viable laterite concentrating.

(4) Although ore similar to that contained in the Coastal property also is found on neighboring private land contiguous to the study area, Coastal controls mining claims covering roughly half the study area. Considerable acreage within the study area could be considered for patent. The study area under question thus has a very real value to not only Coastal but to our national supply of strategic minerals as well.

(5) A wilderness designation most certainly will deny access and prohibit mining within the study area, and effectively prohibit any mining of private areas next to the wilderness area.

(6) Coastal feels very strongly that any adverse action on your part would be tantamount to expropriation.

Please keep us informed of meetings and developments.

Very truly yours,

COASTAL MINING COMPANY

C. A. Dowd

C. A. Dowd
Vice President

CAD/lb

RESPONSE TO COMMENT LETTER 5

A. Please see the General Response to the Comments on page 5-8 and our response to Comment A of Letter 18.

B. Our Public Lands Statistics show 52 cases went to patent in 1982.

C. Please see our response to Comment A, above.

D. See the Appendix and the General Response to the Comments.

F. The average value of the deposit as a mining unit would be considered.

G. See our Response Comment D of Letter 7.

H. Please see our response to Comment B of letter 3.

I. Three strategic minerals exist and a market exists. The EIS gives Congress adequate information to make an informed decision. Because of the number of variables it is not meaningful to compare dissimilar deposits; one must compare like deposits (lateritic with lateritic), like mining methodology, and like recovery methods.

J. See our response to Comment A, above.

K. The text has been clarified in an attempt to more clearly explain the complexities of this situation.

L. Please see our response to Comment A, above.

RESPONSE TO COMMENT LETTER 5 (Cont.)

M. The Federal Emergency Management Agency determines what materials are of strategic importance. The listing of the materials does not differentiate between "strategic" and "critical" and the terms are often used interchangeably. According to the definition given all of the minerals would be strategic.

O. See our response to Comment A, above.

P. See Response Comment B of Letter 15.

Q. See our Response Comment E of Letter 7.

Q.1 Please see our response to Comment C of Letter 19.

R. The District Manager's decision for the old-growth reserves was and is that they will not be logged. (See the management actions in Chapter 2).

S. The plant list on page 3-17 of the draft was taken directly from a letter from Mendocino County. It has been deleted from the final EIS to avoid confusion. Your statement about the protection of endangered species is misleading because when one species is protected, other species using the same habitat are also protected to a large degree.

T. This section has been clarified.

COMMENT LETTER 6

FRIENDS OF THE EARTH FOUNDATION

1045 SANSOME STREET SAN FRANCISCO CALIFORNIA 94111

(415) 433-7373

Mr. Van W. Manning
District Manager
Ukiah District Office
Bureau of land Management
P. O. Box 940
Ukiah, CA 95482-0940

November 30, 1983

Dear Mr. Manning:

We believe the Bureau should choose Alternative One in the Draft EIS for the Red Mountain Wilderness Study Area. Only wilderness status will protect Red Mountain's unique resources, its rare plants, wildlife, and watershed.

Alternatives Two and Three both allow logging and vehicular use, activities which would significantly degrade the Red Mountain watershed and other natural and visual resources. The special "research natural area" status is not an improvement on wilderness status; research can take place in a wilderness area provided motorized equipment is not used. The Draft EIS proposes that additional public land be added to the RNA/ACEC. We believe this land should also be added to the wilderness area to ensure protection of the wilderness values.

A

The Draft EIS cites the existence of validated mining claims and the inevitability of mining as the principal reasons to eliminate Alternative One. The claims are not valid or patented; there has not been any formal contest. The economics of a nickel/chromium/cobalt open-pit mine are very uncertain. A similar mine in Riddle, OR, is closing, and the Gasquet Mountain Project in Northern California would probably only be possible with a $300 million subsidy from the government. As a wilderness area or a research natural area, the cost of an open-pit mining operation would be increased. In this type of operation, a processing mill and spoil disposal sites must be located nearby.

B

The Rare and Endangered Species Act would definitely hinder mining operations under any alternative. The complete known global distribution of several rare and endangered species is almost entirely within the area covered by mining claims. Because of the sensitive, hostile environment, the native rare plants would have great difficulty growing back if they survived at all. Non-native plants would probably be unable to adapt. Since reclamation and revegetation would be virtually impossible, unnecessary or undue degradation would certainly take place. In addition, open-pit mining is incompatible with Mendocino County land use policy. Therefore, mining may never occur, and the existence of mining claims should not preclude wilderness status now.

C

Clearly wilderness designation is the best of the three alternatives proposed. We recommend that:

1) additional public lands be included in the wildernesa designation to secure further its integrity as a natural area;

2) no logging or vehicular use be permitted;

3) a more complete study of revegetation and reclamation be initiated.

Thank you for this opportunity to present our views.

Sincerely,
Cordelia D.C Pierson
Cordelia Pierson
Conservation Assistant

RESPONSE TO COMMENT LETTER 6

A. The All Wilderness Alternative includes in its recommendation the WSA plus 242 acres of recently acquired land and 40 acres of long-standing public land, both parcels being within the ACEC. (See page 2-4 and map 2-2.)

B. See the General Response to the Comments, page 5-8.

C. Please see our responses to Comment B of Letter 3 and Comment D of Letter 7.

COMMENT LETTER 7

Natural Resources Defense Council, Inc.

25 KEARNY STREET
SAN FRANCISCO, CALIFORNIA 94108
415 421-6561

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202 223-8210

New York Office
122 EAST 42ND STREET
NEW YORK, N.Y. 10168
212 949-0049

November 28, 1983

Van W. Manning
District Manager
Ukiah District Office
P.O. Box 940
Ukiah, CA 95482-0940

Re: Draft Environmental Impact Statement/Preliminary Wilderness Recommendations for the Red Mountain Wilderness Study Area

Dear Mr. Manning:

This letter constitutes the comments of the Natural Resources Defense Council, Inc. (NRDC) on the above-captioned document.

Red Mountain is, as the draft environmental impact statement (EIS) clearly reveals, a truly unique area: its "natural," "botanical" and "scientific" values, its soils, plants, "habitat types and wildlife species" are all "unique." Pp. 2-4, 3-6, 3-8, 3-10.1/ The area is "remote with little human activity," scenic and provides opportunities for solitude as well as ecological values that are found nowhere else in the United States, let alone in the National Wilderness System. Pp. 3-8, 3-6. Thus the area not only meets the requirements of the Wilderness Act, it also possesses "special features" which provide a "prime reason for wilderness designation." 46 Fed. Reg. 47183. And yet, the Bureau of Land Management (BLM) recommends that it not be designated a wilderness area -- principally because of its mineral values. See, e.g., p. 2-9. We disagree with the Bureau's recommendation and urge that Red Mountain be designated a wilderness. In addition, we believe that the EIS's treatment of existing mining claims as well as alternatives and their impacts is inadequate.

A According to the EIS, Red Mountain is, in essence, blanketed with mining claims. Although the the EIS asserts that these claims "are considered valid existing rights....," p. 2-9, it fails to provide the information needed to substantiate this key assertion. In fact, the document contains information which suggests quite clearly that it is unfounded.

1/Unless otherwise indicated, all page references are to the draft EIS.

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B The Red Mountain claims, like all other mining claims, are valid only if the holder can develop them in accordance with all applicable laws and environmental protection requirements, including measures to assure reclamation and protect endangered species, and still make a profit. See, e.g., 41 Fed. Reg. 2648 (January 19, 1976). Although the draft contains no information about the reclaimability of the area's laterite soils, in fact, they have yet to be shown to be reclaimable. See, e.g., Six Rivers National Forest and Del Norte, California County, Draft Environmental Impact Statement/Environmental Impact Report: Gasquet Mountain Mining Project (March, 1983).

C Moreover, the draft fails to demonstrate that mining can take place without adversely affecting the habitats of rare and endangered species. On the contrary, it seems quite clear that mining will inevitably affect those habitats. See, e.g., p. 3-2. The draft plainly errs, however, in suggesting that protection of these areas is subject to valid existing rights. As the Bureau recognized in promulgating its mining regulations, where an unreconcilable conflict exists between the Mining Law of 1872 and the Endangered Species Act, the Bureau can -- and must -- prohibit the mining project. See 45 Fed. Reg. 78905 (November 26, 1980). As indicated, we believe such a conflict exists here. Even if it did not, the company would still have to demonstrate that the higher mining costs caused by the duty to avoid harming protected species and their habitats would not make mining unprofitable.

D Even from the purely economic point of view, the draft EIS suggests that the claims are not valid. For example, it concedes that mining operations would be economically feasible only if they include both private and public lands. See pp. 4-2, 4-4. In as much as the Mendocino County General Plan bans mining on Red Mountain, pp. 3-17, 4-4, the claims are not valid. Moreover, the draft concedes that "the economics of nickel mining in the United States as of this date are uncertain." P. 3-14. The allegation that the Gasquet Mountain project "indicates it is still economical," id., is plainly erroneous: not only has Cal-Nickel yet to prove the project's profitability, the California Mining and Geology Board plainly believes it is not. See 1982 Annual Report, p. 18. Certainly the fact that no plan of operations has been submitted for Red Mountain, p. 2-4, suggests that development of the claims is not profitable.

E Of course, Congress could designate Red Mountain as a wilderness even if the existing claims were valid -- as the draft impliedly concedes. It might also choose to acquire those claims -- an alternative the draft dismisses from consideration on the grounds that it "was found to be impracticable because of cost (over $100 million) and because it violates national policy on strategic and critical metals." P. 2-1. Neither of these

reasons justifies the EIS' failure to consider this alternative.

In an analogous situation, involving preference right leases, the courts have ruled that the National Environmental Policy Act (NEPA) requires the alternative of acquisition of mineral rights to be considered. See NRDC v. Berklund, 458 F. Supp. 925, 938 (D.D.C. 1978), aff'd 609 F.2d 553 (D.C. Cir. 1979). The decision on practicality is for Congress to make. The EIS' bald and totally unexplained cost estimate is useless for decision-making purposes. Moreover, the policy rationale is irrelevant. Since agencies must consider alternatives that are outside their statutory authority, see, e.g., NRDC v. Morton, 458 F.2d 827 (D.C. Cir. 1972); Council on Environmental Quality Regulations, 40 C.F.R. § 1502.14(c), they must consider alternatives which conflict with their administrative policies. In fact, the BLM's mineral policy does not preclude acquisition. Indeed, it specifically excludes congressional action. See p. A-1. Because acquisition may be the only way to "ensure long-term preservation" of Red Mountain's wilderness and other unique values, it should have been considered in the EIS.[2/] E

Finally, as indicated, we believe the draft's impact analysis is inadequate. Instead of the detailed analysis of impact that is required, the draft provides mostly vague and essentially meaningless generalizations such as "protected [s]ubjected to existing rights" and "maximum protection" from mining. Pp. 2-10, 4-10. How much protection will result for Red Mountain's plants, animals and watershed values is not at all clear -- especially when one considers that the area's soils will be "destroyed" if surface mined and that not one of the alternatives under consideration will "ensure long-term preservation of [its] mandatory or supplemental wilderness values." Pp. 4-2, 4-5. Particularly where unique resources are involved, the Bureau must provide full disclosure of the effects of each alternative, including its proposed action. See, e.g., State of Cal. v. Bergland, 483 F.Supp. 465, 487 (1980). F

Thank you in advance for consideration of these comments.

Sincerely,

Johanna H. Wald

JHW:klw

[2/] The Bureau should also develop an alternative course of action in the event the mining claims are not valid.

RESPONSE TO COMMENT LETTER 7

A. See the General Response to the Comments on page 5-8.

B. See our response to Comment A, above and Comment A of letter 9.

C. If a mining operation, through the plan of operations, cannot demonstrate that the requirements of the Endangered Species Act can be met, the permit to mine will be denied. Please see our response to Comments A and B, above.

D. The Mendocino County Board of Supervisors has not used the wilderness study to force the mining issue on Red Mountain. By a vote of 3 to 2 the Board supported the RNA/ACEC alternative with no logging (see Comment Letter 2). The county must protect the environment and yet not "jeopardize the potential or continued extraction of significant mineral deposits from an area" (Policy 1a). The problem of mining and how it relates to the county will be addressed if and when a plan to mine is submitted. The economic analysis will be done at that time.

E. Alternatives addressed were based on best available information, guidelines in the study policy, and management policies. Alternatives considered must be "bounded by some notion of feasibility" to avoid NEPA from becoming "an exercise in frivolous boilerplate." (Vermont Yankee Nuclear Power Corp. v. NRDC). Other guidelines for alternative formulation are given in Guidance Regarding NEPA Regulations (48 FR 34263-34268, July 28, 1983).

F. The impact analysis has been revised (see chapter 4). The Bureau feels the analysis and description of the environment is sufficient to inform the public and for Congress to make an informed decision.

COMMENT LETTER 8

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

J. W. PAGE
MANAGER
LAND DEPARTMENT

November 30, 1983

Van W. Manning
District Manager
Ukiah District Office
Bureau of Land Management
P. O. Box 940
Ukiah, California 95482-0940

Dear Mr. Manning:

Pacific Gas and Electric Company is an investor-owned electric, gas, and water utility, serving over 10 million northern Californians. We have reviewed the draft Environmental Impact Statement prepared for the Red Mountain Wilderness Study Area.

A PGandE supports the Bureau's recommendation to designate this area a Research Natural Area and Area of Critical Environmental Concern, provided that transmission and distribution lines are identified as an allowable use on a project specific basis. Mineral development in particular, which is allowed under this preferred alternative, may require future service. In most cases, transmission lines are compatible with the resource values protected by the RNA-ACEC designation. Through the environmental documentation process, informed decisions can be made about transmission line location and consistency with RNA-ACEC management objectives.

We appreciate the opportunity to comment on this draft EIS. Please contact Diane McQuarie (415) 541-5774 if you have any questions.

Sincerely,

J W Page

RESPONSE TO COMMENT LETTER 8

A. Well designed transmission lines could be compatible with RNA/ACEC designation, and would be a part of the plan of operations if required for mining. However, as explained in the Appendix, mineral development is not anticipated under either alternative.

COMMENT LETTER 9

SIERRA CLUB - REDWOOD CHAPTER

P. O. Box 466, Santa Rosa, Ca. 95402

c/o 29900 Highway 20
Fort Bragg, California 95437

November 4, 1983

District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, California 95482-0940

Public Hearing Record
Draft Environmental Impact Statement - Preliminary Wilderness Recommendations for the Red Mountain Wilderness Study Area

Dear Sir or Madam:

By way of introduction, the Sierra Club - Redwood Chapter's 4800 members make their homes in all or part of the nine northern California coastal counties, including Mendocino County. The Chapter has been deeply concerned for the future of the Red Mountain WSA for many years now, and requests that the following comments be included in the public hearing record for the Draft EIS on preliminary Red Mountain WSA wilderness recommendations. We request also that our concerns be completely and adequately dealt with in the Final EIS.

Cumulative Impacts; Irreversible and Irretrievable Commitment of Resources

A BLM's statements on Page 4-5 that, "There are no significant cumulative impacts from either wilderness designation or nondesignation," and, "There is no significant irreversible or irretrievable commitment of resources as a result of wilderness designation or nondesignation," appear to be contradicted by evidence presented at the October 12, 1983, public hearing in Redway, California. According to evidence presented by Hanna Mining Company, wilderness designation would not only "...very likely add to the environmental protection stipulations required and could result in restrictions on the use of motorized equipment " (Draft EIS Page 4-4, top of page), such wilderness designation would effectively preclude the mining option entirely. This statement should be recognized for the expert

testimony that it is.

B Accordingly, the Final EIS, in recognizing that the proposed ACEC/RNA designation will not prevent mining, and that wilderness designation is likely to, should deal exhaustively with the many cumulative impacts that may derive from non-wilderness designation. Of paramount concern to Redwood Chapter members are potential adverse impacts on water quality (sediments and nickel ion entering fisheries and water supplies), air quality (possible acid rain from concentrating and/or refining activity), socioeconomics (the boom-bust mining cycle as it affects this sparsely settled area), and on the remaining outstanding wilderness resources at Red Mountain.

Mining Claim Validity/Non-Validity

C Although an in-depth look at the question of mining claim validity or non-validity could have profound effects on an analysis of potential environmental impact, this discussion is one of the weakest in the Draft EIS. A major problem is the total lack of any evidence record to back up findings that the Red Mountain claims are valid, or to support the many conclusions to this effect, while ignoring the very obvious evidence record pointing to mining claim non-validity.

As examples, on Page 2-9 the statement is made that, "The mineral claims are considered valid existing rights;" on Page 4-3, "The Bureau's opinion is that the claims are valid;" on Page 4-5, "Mineral claims in the area are considered valid existing rights;" on Page 4-5, "Mining is an existing right." When one searches for the evidence record in the Draft EIS to support these findings, one finds only reference to a five year-old study that was preliminary only at the time it was made and out-dated at this time, reference to a highly speculative Casquet Mountain project that is not economically viable without enormous government mining subsidy, and vague speculations about the future of mining technology (Page 3-14). This appears to be the entire evidence record on the subject of mining claim validity at Red Mountain WSA.

When looking at the evidence record for claim non-validity, however, some very important evidance is found on Page 3-14 to support non-validity. In paragraph 3, the statement is made that, "With the closing of the nickel mine in Riddle, Oregon, in 1982, the economics of nickel mining in the United States as of this date are uncertain." The discussion then proceeds to point out that Red Mountain-Little Red Mountain "ranked second behind the Riddle operation.." (IN RESOURCE VALUES). Furthermore, in a major internal inconsistency with the many conclusory statements about claim validity, the Draft EIS on Page 3-14, paragraph 3, line 16, admits that it is unknown if the Red Mountain claims can be operated profitably. It is therefore also unknown if the claims are valid, in direct contradiction to the many statements made that they are.

C

Selection of Recommended Alternative

We would submit that the evidence record for Wilderness designation of the Red Mountain Wilderness Study Area is overwhelming in its strength as presented in the Draft EIS, and that the evidence record for any other alternative designation is either weak, or nonexistent.

Accordingly, the Sierra Club - Redwood Chapter urges BLM to recognize the many outstanding wilderness values at Red Mountain, and the absence of non-wilderness values, in reversing the tentative recommendation reached in the Draft EIS of ACEC/RNA, non-wilderness, designation. We continue to very firmly recommend wilderness designation for the Red Mountain WSA in recognition of the many outstanding wilderness values to be found there.

Sincerely,

Ron Guenther, Chairman

For the Redwood Chapter Executive Committee

Copies to: Redwood Chapter Officers

Sierra Club Legal Defense Fund

RESPONSE TO COMMENT LETTER 9

A. See our response to Comment A of Letter 18. Note that although wilderness designation would present increased obstacles to mining (i.e., protective stipulations), it is BLM's conclusion that even without wilderness designation mining will never occur at Red Mountain.

B. See the response to Comment A, above, and the discussion of issues in Chapter 1.

C. See our Response to Comment A of Letter 23.

COMMENT LETTER 10

SIERRA CLUB
Redwood Chapter
North Group
POST OFFICE BOX 238
ARCATA, CALIFORNIA 95521

Oct. 16, 1983

Van Manning
District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482

Dear Mr. Manning:

I attended the hearing in Redway last week and listened and watched as the public gave its overwhelming support for a Red Mountain Wilderness. Having reviewed the Draft EIS, I find that the ecological specialness of the area is also recognized by the BLM. The agency's recommendation, however, indicates that political rather than ecological factors determined the choice of the Research Natural Area as the preferred alternative.

A The dEIS states (2-4) that "Because the heart of the potential wilderness area is under nickel mining claims that may eventually be surface mined, it is not possible to ensure long-term preservation of wilderness values." This seems to be the public reason for BLM's recommendation against wilderness. But even under this situation, BLM should not be constrained against the wilderness designation for two reasons: first, the economic feasibility of mining Red Mountain has not been established and second, no analysis has been made of how environmental protection laws adopted since the 1872 Organic Act would affect any proposed mining project.

I am not familiar with the Red Mountain situation, but I am extremely familiar with the Gasquet Mt. project proposed by Cal-Nickel. The second dEIR/EIS released for this project last spring was found inadequate by every state and federal agency, including EPA, on the basis of environmental laws covering clean air, clean water, endangered species, etc. We know with regard to Cal-Nickel that the project is not economically feasible without government subsidies and that environmental protection measures, including reclamation of mined areas and the tailings, may be so costly as to preclude the operation. Furthermore, Cal-Nickel cannot meet air and water quality standards.

A BLM cannot dismiss wilderness status for Red Mountain simply on the speculative assumption that mining will occur. It is not BLM's responsibility to facilitate mining; BLM's responsibility is to ensure the long-term health and well-being of the public's resources.

A BLM should prepare a revised dEIS on the Red Mountain WSA to include an exhaustive analysis of all the laws and regulations which BLM and other agencies would be required to apply to any mining project. Only after this review will BLM, the public, and Coast Mining know exactly how mining will be affected by existing environmental laws. It may well be that mining will simply not be possible.

Thank you for consideration of our comments.

For the Executive Committee,

Susie Van Kirk

Susie Van Kirk,
Conservation Chairman

RESPONSE TO COMMENT LETTER 10

A. BLM now believes that because of the Endangered Species Act, no mineral development will take place under either alternative. Please see the Appendix and the rationale for BLM's recommendation on page 1-7.

COMMENT LETTER 11

THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

November 22, 1983

Van Manning
District Manager, Ukiah District Office
Bureau of Land Management
Ukiah, CA 95482

Dear Mr. Manning,

The California Native Plant Society wishes to submit the following comments on the Red Mountain Wilderness Study Area EIS.

We commend you on the concise, yet informative EIS. We feel that adequate research has been conducted to base a decision upon the fate of Red Mountain. We disagree, however, on the decisions that are being presented in the document.

The immense natural values of Red Mountain call for planning and decision-making that will preserve for every citizen of the United States--and especially future generations--the rare resources that occur there. Most notably are those of the flora and vegetation.

CNPS agrees that a Research Natural Area designation is appropriate for the area. We also agree that Red Mountain be classified as an Area of Critical Environmental Concern, for that is exactly what it is. And we also feel it is deserving of wilderness status.

It is the opinion and policy of the California Native Plant Society that wilderness designation is the simplist and most effective way to preserve representative samples of natural ecosystems. When the ecosystems are as rare and valuable as occur on Red Mountain, the entire area should be set aside.

A The draft EIS entirely failed to address (let alone decide upon) the critical issue of mineral rights at Red Montain. No alternative was presented which precluded mining near or on the wilderness study area. This is a serious flaw in the draft, and we hope that the final EIS will address the issue.

It is within the authority of the Department of Interior to withdraw the mineral rights from Red Mountain, and especially necessary when the public values of the rare and endangered plant species are considered.

The argument that management and maintenance of wilderness values in the area cannot be achieved because mining development would destroy those values is specious. The question is then begged--just what does BLM intend to do about the mining issue? For that matter, even in the prefered alternative, how can BLM protect the botanical values from mining in an RNA and/or ACEC? The clear choice, when exploitation threatens a national heritage such as endangered species is for the managing agency to use its discretionary powers to protect the resource.

B We further believe it possible to improve the resource base by the aquisition of certain private lands. We recommend such an action and request that it be analyzed in a new alternative.

D The ideas and desires of CNPS are incorporated into a new alternative which protects the resource base while still allowing its enjoyment and use. This alternative is illustrated on the enclosed map. We hope that BLM will give this alternative its proper consideration and recognize--as we and many other citizens and groups do--that Red Mountain deserves the utmost care and protection.

Thank You,

Dwain Goforth

Dwain Goforth
Northern California
Conservation Representative
P.O. Box 4127
Arcata, CA 95521

RESPONSE TO COMMENT LETTER 11

A. See the General Response to the Comments on page 5-8, and our response to Comment A of letter 10.

B. The Cedar Creek Habitat Management Plan identifies approximately 1,000 acres for acquisition (in addition to those lands already acquired) to improve the biological resource base. Please see our response to Comment A of Letter 6. The lands acquired were not identified in the HMP but still improved the management effectiveness because of land consolidation.

D. The majority of lands identified in your new alternative are privately owned and as such are not now appropriate for wilderness consideration.

COMMENT LETTER 12

THE WILDERNESS SOCIETY

FOUNDED IN 1935

Mr. Van W. Manning
District Manager
Ukiah District Office
Bureau of Land Management
PO Box 940
Ukiah, CA 95482

November 22, 1983

Dear Mr. Manning,

I am responding to the Red Mountain EIS of September 1983. The Wilderness Society has long been involved in the effort to protect Red Mountain. This is a unique and beautiful area, drawing such deep concern and loyalty from those familiar with it that great amounts of volunteer and professional time and expense are involved in the effort to preserve the mountain.

The preferred alternative management plan for Red Mountain would grant some protection to the area, but is not stringent enough to prevent degredation of scenic, wildlife, and wilderness values. This sres is acknowledged by a large majority of people to be worthy of wilderness designation, and there is no point in investing in the effort and time of a planning evaluation unles the alternative most suited to the needs of an area -- not one which somewhat applies to those needs -- is proposed.

A One important conflict over wilderness designation of Red Mountain appears to be whether mining will occur there or not. Wilderness is a resource, like all other resources such as timber and minerals, and should be given equal weight with all other use options. In this case particularly public use and benefit must be given the same consideration as private profit. The mining question is very ambiguous here: claims have not yet been proven valid. Therefore, the mining interest can in no way be allowed to interfere with evaluation of the area as a wilderness site.

Timber harvest and mining alike threaten rare soils, important water and fishery resources, would disturb wildlife habitats, and impair or ruin the opportunities for recreation, solitude, and scenic qualities. If this area is eligible, as it is, for Endangered Species protection, then the only alternative for a coherent management is to ensure these attributes are left unchanged through wilderness designation.

278 POST STREET, #400, SAN FRANCISCO, CA 94108
(415) 982-2975

Red Mountain is a unique and beautiful example of our increasingly rare wilderness lands. It should be evaluated completely, with equal weight given to all resource potentials. The land management process in this case has been rushed, with an obvious bias against wilderness for specious land development reasons, and is not acceptable.

Sincerely,

Patricia Hedge

Patricia Hedge
Regional Director, California-Nevada

RESPONSE TO COMMENT LETTER 12

A. See General Response to comment letters on page 5-8 and our response to Comment A of Letter 2 and Comment B of Letter 3.

COMMENT LETTER 13

DOUGLAS H. BOSCO
1ST DISTRICT, CALIFORNIA

COMMITTEES
PUBLIC WORKS AND TRANSPORTATION
MERCHANT MARINE AND FISHERIES
POST OFFICE AND CIVIL SERVICE

Congress of the United States
House of Representatives
Washington, D.C. 20515

1330 LONGWORTH BUILDING
WASHINGTON, D.C. 20515
(202-225-3311)

SUITE 329
FEDERAL BUILDING
777 SONOMA AVENUE
SANTA ROSA, CALIFORNIA 95404
(707-525-4235)

THE EUREKA INN
SUITE 215
7TH & F STREETS
EUREKA, CALIFORNIA 95501
(707-445-2055)

November 11, 1983

Mr. Van Manning
District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482-0940

Dear Mr. Manning:

Thank you for sending me a copy of the draft environmental impact statement on the preliminary recommendations for the Red Mountain Wilderness Study Area. I appreciate the opportunity to comment.

A In view of some of the concerns that have been expressed about the BLM's proposed action, I would urge you to include an additional alternative in the final EIS that would preclude timber harvesting under the Research Natural Area/Area of Critical Environmental Concern designation.

Cordially,

DOUGLAS H. BOSCO
Member of Congress

DHB:btv

RESPONSE TO COMMENT LETTER 13

A. See the response to Comment A of Letter 2.

COMMENT LETTER 14

MR BURTON L BANZHAF
PO BOX 652
UKIAH. CA 95482

October 2, 1983

District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, Calif 95482

Re: Comment on Red Mountain Wilderness Study Area

Dear Mr. Manning:

I have read the draft of the EIS on the Red Mountain Wilderness Area and would like to have the following comments become a part of the final report.

I am against this or further wilderness areas because they do not give the aged senior citizen, the blind or the disabled any consideration or available use. As you know, the U.S. Forest Service as well as yourself are closing more and more area to vehicle travel. Placing REd Mountain in wilderness status just cuts off some more land from use to the majority of persons.

A Your EIS does not address the impact this will have on disab led persons such as myself, a senior citizen with COPD (emphysema) who can no longer walk but just very short distances. There are many others with some other type of health problem who will be prevented from enjoying the use of this or any other wilderness area that they can't drive into or be driven into.

As with the senior citizen with health problems, the blind are also restricted from use of wilderness areas because access can be only by foot or horseback.

Any disabled person, at the very best, regardless of age, has limited use of a wilderness area.

In my opinion, we already have enough wilderness areas in the west and in our immediate area.

Your EIS report should address this issue of access and usability by persons unable to walk. Consideration should be given to possibly having limited vehicle access instead of full wilderness status, which restricts the use to a very limited few.

Sincerely,

Burton L. Banzhaf
P.O. Box 652
Ukiah, calif 95482

cc: Congressman Doug Bosco

RESPONSE TO COMMENT LETTER 14

A. It is recognized that some individuals because of disability(s) are not be able to enjoy certain public lands. Because of lack of access to Red Mountain there has been very little recreational use, and because of the special features in the area heavy recreational use is not desirable.

Although our recommendation for this area is nonwilderness, our projected management actions (see page 2-1) preclude developments necessary to provide access for the disabled. In fact, access in general will continue to be very limited. Although the lack of access may help protect some of the area's resources (i.e., endangered plants) we recognize it as a disadvantage to some individuals (particularly the disabled) and will take that into consideration when making our recommendations and decisions regarding this and other areas.

COMMENT LETTER 15

Kenneth L. Diamond
PO Box 111
Leggett, Ca 95455

Bureau of Land Management
P.O Box 940
Ukiah, Ca 95482

Oct 27, 1983

I feel that the DEIS on Red Mt. Wilderness, while readable, is inadequate and premature.

This study as premature in many ways and especially when Judicial and Congressional matters are being considered this autumn on

1) Split-Estate Lands which Red Mts. is.

Example: The case in which Dept. of Interior Bureau of Land Management vs. Sierra Club.

2) House Interior Subcommittee Hearings on Public Lands.

A The DEIS never addresses the impact of the proposed action on the Wilderness or adequately "Values" the Wilderness as a resource. In the Mendocino Supervisors meeting Oct. 11, 1983 Norman de Vall referred to Red Mt. as a "gold mine" of Wilderness Characteristics. It would be a greater asset to Mendocino County

and local economy as Wilderness, then a great economic drain to the county and loss of most economy in the area.

B It seems to me, that BLM is reversing its evaluations of Mandatory Wilderness Characteristics in reference to Cedar Creek in the Red Mts Study. In the Final Intensive Inventory Wilderness Study of Dec. 1979 p. 163, Cedar Creek is ideal for solitude. But, in the wilderness study it now has stated Cedar Creek is "somewhat" impeded seclusion by steep topography DEIS p 3. This is a change in policy to me and inadequate.

The Board of Supervisors for Mendocino county on Oct 11, 1983 could not agree on any of your alternatives. So, then Paddock one of them won on a 3 to 2 vote for ACEC/RNA, without any timbering for timbering destroys the integrity of the intact ecosystems.

So, Again this study is inadequate and premature. RE Study!

Kenneth L Diamond

RESPONSE TO COMMENT LETTER 15

A. See page 4-1 of this final EIS.

B. The inventory phase of the wilderness review process determined which areas met the minimum requirements for wilderness. The study phase is a more detailed analysis and considers all values, resources, and uses within the WSA, and attempts to refine the relative values of the mandatory wilderness characteristics.

COMMENT LETTER 16

11-28-83
Box 522
Covelo, CA 95428

Van W. Manning
District Manager
Ukiah District Office
P. O. Box 940
Ukiah, California 95482-0940

Dear Mr. Manning--

The BLM's dEIS entitled "Preliminary Wilderness Recommendations for the Red Mountain Wilderness Study Area in the Arcata Resource Area" fails not only to recommend the wilderness values or Red Mountain for preservation but also to even consider that wilderness for preservation. The dEIS sidesteps the consideration of a Wilderness alternative by simply asserting that Red Mtn. must remain open to mining, and therefore by assuming that it cannot be manage as wilderness (A 1-3). Additional unsubstantiated assumptions include: 1) that the mining claims are valid (2-9), 2) that the BLM should not attempt to resolve the conflict between mining and wilderness values (2-8), 3) that the BLM can administratively protect the ecological and scientific values on Red Mtn. from degradation due to mining by "planning for mitigation of impacts" (2-9), and 4) that mining on private lands would only impact the two identified wilderness characteristics, naturalness and solitude, and would not affect the other identified major values of the area: scientific and ecological resources.

A

5-43

As if these strange assumptions weren't enough to cast doubt on the adequacy of disclosure in the dEIS, the following noteworthy omissions certainly strain further the document's credibility, as it lacks:

1) An analysis of the long-term effects of mining on the natural resources, and the inherent managerial conflicts between the two-- i.e. including the effects of air emissions, habitat disruption, water quality and soil stability.

B

2) An economic analysis of logging (which is allowed in alternatives 2 and 3 in the eastern portion) and analysis of the suitability of sites for timber production: determination of allowable cuts and sustained-yield.

C

3) Consideration of water, fishery and wildlife values in each step.

4) The solitude constraints of the wildlife.

5) The economic viability of the mining claims and the need to publicly subsidize the mining.

D

6) Consideration of purchase or exchange of contiguous private roadless areas for the purposes of establishing more ecological boundaries for the area.

E

These omissions are swept aside and most notably ignored in the "Environmental Consequences" section wherein the environmental consequences of the mining are mentioned only in a favorable light ("400 to 500 jobs and an undetermined tax benefit" (4-4)), while the effects of the mining activity on the wilderness environment itself is not even mentioned--except where such effect are claimed to be unknown ("Impacts on water quantity and quality entering the Eel River system are not determinable at this time" (4-3); "This (reclamation of the mined area) cannot be predicted with certainty because of the many unresolved difficulties in revegetation of these soil types" (4-3)). The precise effects, of course, are unknown in the sense that they may not be presently quantifiable, but the general overall effects of such a strip mine would certainly be extremely degrading to the natural environment!!! Failure to at least mention this fact constitutes a pathetic oversight.

B

I believe that this dEIS violates NEPA on at least the following counts: 1) the full range of impacts of mining are ignored, 2) the document gives an unbalanced presentation of the advantages and disadvantages of the proposed plan, 3) opposing views are not considered (they are mentioned only in passim), 4) the very reasonable alternative (given the numerous economic, environmental and legal constraints) of wilderness designation without mining is not discussed at all. This dEIS approves of the mine in every alternative, and in effect is used as an instrument to rationalize the mining-- while it neither considers the prevention of environmental damage nor discloses to the public any economic basis for managing the timber for logging or the soils for mining.

F

Knowing that the potential damage resulting from mining Red Mountain would mean complete disruption of the fragile ecology of the entire area--anyone who has studied the Gasquet Mine project knows this for a

3.

fact; knowing that the effects of this disruption would not be limited to the roadless area--from trucking the coal to processing the ore to the leaching of heavy metals into a major tributary of the South Fork Eel River, to the boom and bust economy of construction to operation to exhaustion; knowing that there are no federal lands designated as wilderness in Mendocino County, that the bulk of land in Mendocino County is private land which has been notoriously been overcut; Knowing most fundamentally of all that the first fact concerning Red Mountain is that it is a wilderness. (It is not primarily the site of mining claims.) I believe that we should recognize the natural condition of wilderness on Red Mountain and respect and honor it by preserving it. I believe this to be the only way we can honor and respect ourselves for what we do there.

Sincerely Yours,

James Arthur Ferrara

James Arthur Ferrara

RESPONSE TO COMMENT LETTER 16

A. See our Response to Comment A of Letter 18 and the General Response to Comments on page 5-8.

B. Since it is predicted that mining will not take place under either alternative (see the Management Actions in chapter 2), the impacts of mining are not relevant to the wilderness recommendation.

C. The timber that could be harvested on a sustained yield basis was identified in the Timber Production Capability Classification Inventory in 1978 and the Red Mountain Management Framework Plan.

D. See the General Response to Comments on page 5-8.

E. Consolidation of ownership is an ongoing Bureau program (242 acres have been acquired adjacent to the WSA). See pages 2-4 and 2-5.

F. Please see our response to Comment A of Letter 13.

COMMENT LETTER 17

6415 Regent Street
Oakland, California 94618
16 September 1983

Van W. Manning, Manager
Ukiah District, BLM
P.O. Box 940
Ukiah, California 95482

Dear Mr. Manning:

Thank you for sending me a copy of the draft EIS on wilderness status for the Red Mountain public lands, Mendocino County. I should like to compliment your staff on what is on the whole an unusually well written and lucid presentation. I have only a few minor objections from this perspective:

A I have never before seen the spelling "ultramaphic" for "ultramafic" (pgs. 3-5, 3-6, 3-3. This spelling negates the derivation, which relates to high content of magnesium (Ma) and iron (Fe), thus giving "maf".

B Nowhere did I find mention that a bog is involved in the public lands in sections 17 and 20 though it is implied by the nature of the plants in the second list, pg. 3-5, and the use of the phrase "These bogs" (eleven lines from bottom, same page). Was something dropped out? A citation is given here ("BLM 1978") but there is no list of references so its identity remains a mystery.

C The controversy over distribution of Arabis mcdonaldiana has not really been set before the scientific community yet (lines 8 and 9, pg. 3-6) as Goforth's work for the Six Rivers National Forest has not been made available for public scrutiny. So far as I am aware any controversy remains between USFS and FWS (and possibly BLM), and perhaps Goforth's sponsors at Humboldt State University.

D There is inconsistency between the "rare plants" given on pg. 3-17 and those on pgs. 3-5 to 3-6. Actually, the Silene and the Sedum also are List 2 CNPS rare plants in the current Inventory, while the Lomatium is only a List 3.

E The statement pg. 4-2 re wildlife under the three alternatives seems contradictory. Alternative 1 is said to give wildlife and fisheries "maximum protection", whereas Alternative 3 "would potentially result in the least impact on wildlife". Clarify.

Now as to the substance of the DEIS:

F Re mining, there should be some discussion of the significance of the difference between patented and unpatented mining claims.

It is not apparent why some of the points mentioned in favor of RNA-ACEC designation could not also obtain under Wilderness (e.g., rehabilitation of areas occupied by abandoned roads, development of an HMP for Cedar Creek and its fisheries, ACEC-status for the bog area).

G Discussion of the economics of possible mining and the situation re "strategic" minerals is not adequately treated. These matters are controversial, a fact not brought out in the DEIS.

H On the basis of the facts presented in the DEIS, Wilderness-status has some distinct advantages and does not clearly have any disadvantages. Under it there would be no logging and no vehicular access (which might have a dampening effect on maintaining mining claims), and it would not be possible to file new mining claims.

Wilderness seems to afford the maximum protection for the area in all categories mentioned except, possibly, that of wildlife, where the text is contradictory but suggests that increased use might result and have some adverse effect on wildlife needing solitude. Actually, there seems less chance of such disturbance under Wilderness than under RNA-ACEC, however, for timbering, continued use of vehicles, continued and even increased mining-claim activity are all to be expected.

On the whole, I believe the goal of protection of this unique area clearly favors designation as Wilderness. Since mining is not thereby precluded, this designation would not even "lock away" the minerals from exploitation if needed in time of national emergency. Better to stockpile them for such an occasion than give away public resources now for private gain and immediate use. A fourth alternative should be considered: Wilderness status for the 6,173 acres plus ACEC status for the bog area.

The only real objection set forth to Wilderness status is that, if mined, the character of the land would be changed so that it wouldn't qualify as Wilderness. Until that happens, it isn't an argument against Wilderness, especially in the light of the county's general plan statement against mining on Red Mountain. Moreover, Wilderness status, precluding further mining claims and precluding vehicular access to work on existing claims, might impede its ever happening. I urge the fourth alternative set forth in the foregoing paragraph.

Sincerely,

Alice Q. Howard

Alice Q. Howard

RESPONSE TO COMMENT LETTER 17

A. The correct term is ultramafic.

B. The bogs referred to on page 3-5 of the draft are not within the study area. The bogs were mentioned to show the scientific values of the entire area. This section has been clarified. The reference "BLM 1978" is the planning documents for the Red Mountain Planning Unit; this has been clarified.

C. Noted. The CNPS Inventory of Rare and Endangered Vascular Plants of California (1st Supplement) shows range extensions to the Crescent City and Gasquet quadrangles. The Arabis recovery plan is currently being prepared and should resolve some of the controversy.

D. The list on page 3-17 of the draft was taken from a letter from Mendocino County. It has been deleted in this final to avoid confusion.

E. Chapter 4 has been totally rewritten.

F. In contrast to wilderness designation, the RNA/ACEC designation permits a degree of flexibility and more options when addressing rehabilitation of abandoned roads, developments associated with Cedar Creek and the HMP, and other values. Surface resources--i.e. trees and vegetation--are not considered part of a mining claim and as such, management responsibility would remain with BLM. Patented claims transfer all resource values, both surface and subsurface to the patentee.

G. Please see our response to Comment B of Letter 16.

H. Please see our response to Comment A of Letter 2.

COMMENT LETTER 18

October 7, 1983

Mr. Van W. Manning
District Manager
Ukiah District Office
Bureau of Land Management
Ukiah, California.

Dear Mr. Manning:

We have reviewed the Red Mountain Wilderness Study Area draft EIS and find it incomplete, inadequate, and illogical.

The BLM document admits that Red Mountain has "exceptionally high ecological and scientific values that warrant recognition and protection." It then denies wilderness status because of existing "unpatented mining claims" which, if exercised, would completely destroy the wilderness characteristics. The document also admits that mining claims would have to be proven valid. How can wilderness protection be denied because of mining that may never happen?

A

BLM is required to consider "all reasonable approaches" in planning management practices. Why is there no detailed investigation of alternatives that would protect the wilderness characteristics from destruction until the mining issue is settled? Alternative 3 would allow management practices such as logging and road building even though the document states that such activities would have unavoidable negative impacts on Natural Areas. BLM is also required by Federal Law and regulations to give full weight to the Endangered Species Act which is in conflict with mining laws and probably would protect the wilderness values of Red Mountain.

B

The recommendation to deny wilderness status to Red Mountain is obviously a political one. The issue of wilderness designation is, to a large degree, the issue of whether the mountain should be mined. Coastal Mining has stated that "a wilderness designation . . . would most certainly deny access and prohibit the mining . . ." The BLM document, however, states that "wilderness designation would not preclude mineral development."

C

We demand that you prepare an adequate EIS that will recognize and protect the Wilderness values of Red Mountain. Once the interim wilderness protection is lost, the unique and special characteristics of Red Mountain could be destroyed forever.

Sincerely,

Don Morris

Mary Morris

RESPONSE TO COMMENT LETTER 18

A. BLM's rationale for its No Wilderness recommendation for this WSA appears on page 107. We now believe that because of the Endangered Species Act, mining would not take place under either alternative (See the Appendix).

B. Consideration of such an alternative is not necessary because BLM is prohibited by its Interior Management Policy (IMP) from impairing wilderness values of WSAs before Congress makes its decision on the area.

No logging is planned for within the WSA. See the management actions starting on page 2-1.

C. See the last sentence of our response to Comment A, above.

COMMENT LETTER 19

Nov. 10, 1983

Mr. Van Manning
District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, California

Dear Van Manning:

I object to the conclusion of the summary to the EIS for Red Mountain. I object because it is an insult to my inteligence. It is an insult to the professional training of those in your office. An assessment is an appraisal. It points out differences. Everyone in your office, I hope, knows that the consequences of multiple use management differ from those of wilderness management and, therefore, the consequences cannot be "relatively similar." Perhaps they can not see through the distortions of definitions and logic in this document, but anyone can see the difference between a logged hillside and the wilderness it was before. A

You also neglected major resource issues relevant to land-use planning for the area. No determination of pre-emptive Native American rights was made or considered. The "use and benefits derived off-site," such as the impact to the Pacific salmon fishery and the impact to tree farmers from air quality degradation, differ ledislatively in all alternatives. (see pg. 8,21 of Wilderness Policy Act) Where is the socio-economic impact of these uses of wilderness? B C

I would appreciate copies of the following:
-- National Enviromental Policy Act
-- Mining Act
-- Endangered Species Act
-- FLPMA

Ivana and I enjoyed seeing you and the other members of the staff at the Redway Hearing. Sorry that time did not permit us to stop by the next day at the office. I hope to be able to share more of my thoughts as I read the document.

Sincerely,

Jesse Noell

Jesse Noell
286 E. Mt. Drive
Santa Barbara, Ca.
93108

RESPONSE TO COMMENT LETTER 19

A. Although we now believe that mining will not take place under either alternative, (see the Appendix), impacts under the two alternatives remain similar because projected management actions (see chapter 2) are similar for both alternatives.

B. Under the American Indian Religious Freedom Act of 1978 (P.L. 95-341), the United States has set a policy to "protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions . . . including access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites." BLM is unaware of any such values identified within the Red Mountain WSA which would be affected by any action of any of the alternatives. To date, none of the Native American groups which were sent a copy of the draft EIS have commented.

C. The site specific impacts of mining, to which you refer, will be assessed at the time a plan of operations is submitted.

COMMENT LETTER 20

Nov. 26,1983

Dear Van Manning:

A

I have been trying to determine why this document is so difficult to read. At first it seemed that the conflicting statements were due to a hurried job by several poorly coordinated parts of the office. But it is deeper than that. The logic of the document is faulty. The logic starts with the premise "the claims are considered valid". BLM considers them valid because:

1;) In 1978, at the peak of the inflated metals market, when nickle sold for over $12.00/lb.,the Bureau of Mines did a study showing that Red Mt. was "approaching minability". The fact that the world price of nickle today is $3.60/lb. is not considered .
2.) "Hanna's Riddle operation will continue for 5 to 10 years at higher grades than Red Mt." This mine has shut down.
3.) BLM considers the Gasquet Cal-Nickle project to be economical but fails to point out that the economics are based on pending government subsidies to be financed by the taxpayer at a cost of many millons or billions of dollars.

The premise leads to the statement: "there can be no assurance that the WSA can be managed to preserve its wilderness character.", and therefore BLM's conclusion is to prefer an Alternative which degrades and destroys the significant values documented to be best protected by wilderness.

BLM's logic is wish-wash or wash-wish, it most certainly is based on distortion, speculative uncertainties and assurances. I would like to point out that there are many things BLM can ponder doing, but that there are two things which BLM must do now: Manage to enforce the intent of the Endangered Species Act to preserve entire ecosystems upon which the species depend, and as public servants abide by the will of the people.

B

PS. No mention is made of the enviromental consequences of air quality, or how it is affected by the Alternatives. I want to see the impacts on forestry and fisheries. Please tell me the enviromental and economic consequences for Class 1 and Class 2 air quality on my tree farm. They differ legislatively you should be aware. Also, I want the plants, birds, and all the other significant wilderness values protected as wilderness.

Sincerely,

Jesse L. Noell
286 E NM Drive
Santa Barbara Ca
93108

RESPONSE TO COMMENT LETTER 20

A. BLM now believes that because of the Endangered Species Act, the potential validity of the claims is not relevant. Please see the General Response to the Comments on page 5-8 and our response to Comment B of Letter 3.

B. See Response C to Comment Letter 19.

U.S. Dept. of the Interior
Bureau of Land Management
Ukiah District Office

Dec. 5, 1983

Dear People,

I have pondered over this letter since our meeting in Redway concerning your refusal to recommend Wilderness Status for Red Mountain. I've been trying to think of something new that you haven't already heard that will convince you to protect our mountain from strip mining. I keep trying to convince myself that BLM is not actually controlled by the money and power of the Hanna Mining Corp. Frankly, I just don't understand your E.I.S. Red Mt. fits all the criteria for Wilderness. The people that live here would be hurt so badly by mining. Why can't you see this? The

A issue is mining and in essence you have concluded "Go ahead and mine, Mr. Dowd." I spoke with Mr. Dowd at our meeting in Redway. He told me all sorts of cheery things like, "When we get through mining there will be more fish in Cedar Creek than ever." And when I asked him about the endangered Arabis macdonaldiana, he told me, "We won't touch a rock with one of those plants on it." Is that what they've told you at BLM, too? Now, you & I both know if you destroy a plant or an animals environment you destroy the plant or animal. What about all the animals that live there? With all the people that have moved in around here, they need the wilderness

B area even more. Why, as Jim Eaton from the Salmon Trollers Ass. asked, was there no mention of salmon in the E.I.S.? There are so many unanswered questions. I believe your study to be incomplete and faulty in logic. Please reconsider and protect our beloved mountain. Please recomend Wilderness protection for Red Mountain.

Sincerely
Karen Richards
57328 Bell Springs Rd.
Laytonville, Ca. 95454

5-51

RESPONSE TO COMMENT LETTER 21

A. It is BLM's opinion that because of the Endangered Species Act, mining will not occur under either alternative. (See the Appendix.)

B. Steelhead trout are the only salmonoids which use Cedar Creek within the study area. Impacts on steelhead are discussed on pages 4-4 and 4-8.

COMMENT LETTER 22

Nov. 30, 1983

District Manager
Ukiah District Office
Bureau of Land Management
P. O. Box 940
Ukiah, California 95482

I have read and considered the draft E.I.S. for preliminary Wilderness Recommendations for the Red Mountain W.S.A. I commend the staff for a fine job of delineating the W.S.A., the proposed alternatives and the environmental consequences of each. However, I believe the wealth of unique features and overall wilderness experience fully support Alternative 1-All Wilderness.

The Red Mountain W.S.A. is truly unique. The rare and endangered plant species, endangered wildlife species, valuable riparian habitat, unique soil features and other wilderness characteristics considered individually would not warrant wilderness designation. The outstanding characteristic of Red Mountain is that such a diverse assemblage of unique biologic and geologic factors exist and interact in such unique ways in a relatively compact area. Red Mountain provides a rich field for scientific study as well as a truly unique wilderness experience.

A The only apparent bar to wilderness designation is the possibility that mineral deposits (which account for many of the areas unique features) might someday be subject to mining. For several reasons I believe it is unlikly that this area will ever be mined.

According to the draft E.I.S. "...a minimim of 35 million tons of laterite averaging 0.8 percent nickel is necessary to approach minability." The estimates for Red Mountain are "...30 to 40 million tons of laterite averaging 0.8 percent nickel...." These estimates indicate that any mining operation would be marginal.

Provision would have to be made for the protection of rare and endangered plant and animal species and the valuable steelhead nursery which exists in Cedar Creek. Several hundred people depend on the Red Mountain watershed for their water supply and their needs would have to be considered. Mitigation measures for all of the above, plus reclamation costs would prove to be so expensive as to tip the scale against the marginal economics cited above.

B The Land Use Element of the Mendocino County General Plan specifically states that "...no permits for large-scale mining of the Red Mountain shall be issued by the county." Without the proper permits, there can be no mining.

I can assure you that mining will not take place because the people of Mendocino County will not stand for it. In the event that the land use element for Red Mountain were changed, it is certain that an aroused citizenry would collect enough signatures to put issue on the ballot. I have no doubt that the people would vote to preserve our rural quality of life.

I hope the final E.I.S. will give more consideration to the marginal feasibility of mining in view of the economic and political realities of the situation.

C I would also hope that the final E.I.S. would discuss the significance of Red Mountain to the Native Americans indigenous to the area.

In closing, I reiterate that All Wilderness is clearly the best alternative for Red Mountain. It would be a travesty to provide anything less than maximum protection to the unique wilderness values of the Red Mountain W.S.A.

Sincerely,
John River

John River
PO Box 454
Ukiah, Ca. 95482

RESPONSE TO COMMENT LETTER 22

A. See responses to Comment A of Letter 18.

B. See response to Comment D of Letter 7.

C. See response to Comment B of Letter 19 and the response to Comment A of Letter 25.

COMMENT LETTER 23

Mr. and Mrs. James Rogoff
P.O. Box 253
Leggett, CA 95455

District Manager
BLM
Box 940
Ukiah, CA 95482

Dear Sir:

A I feel that the BLM preliminary draft recommendations for Red Mountain wilderness are inadequate and short-sighted. BLM contradicts itself in saying that mining claims are both valid and unproven. The general assumption is that mining will take place. Yet the Rare and Endangered Species Act provides protection equal (if not superior to) the outdated Mining Laws of this coutry. Alternative three in BLM's recommendations will not protect Red Mountain until this issue can be decided. It allows degredation of wilderness values before this important decision is made. Red Mountain provides a rare enviroment for enjoyment - rare soils, plants, animals and ecosystems, sitting and hiking in Red Mtn. provide beautiful vistas of the ocean coastline, Yolla Bolly mountains and coast range - offering the solitude of an eagle soaring high sbove the coastal mountains - and the curiosity and insights found studying its rare and beautiful enviroments. Red Mountain is a very special place. It requires and deserves Wilderness protection.

Sincerely

James David Rogoff

Deborah Ann Rogoff

P.S.
Please send a copy of the preliminary draft and future materials to:
William M. Rogoff
5140 Valley Rd.
Lincoln, Neb. 68510

Copies of this letter sent to:

District Manager, BLM

Board of Supervisors

Assemblyman Dan Houser

Senator Barry Keene

Congressman Doug Bosco

Senator Alan Cranston

RESPONSE TO COMMENT LETTER 23

A. Please see the General Response to Comment Letters (page 5-8) for an explanation of valid mining claims as they relate to Red Mountain. As explained in the Appendix, BLM now agrees with the contention that the Endangered Species Act will prevent mineral development of this WSA.

COMMENT LETTER 24

68 Metsko Lane
Trinidad, CA 95570
November 20, 1983

District Manager
Ukiah District Office
Bureau of Land Management
P.O. Box 940
Ukiah, CA 95482-0940

Re: Draft EIS, Red Mountain
Wilderness Study Area (WSA)

Dear Sir:

The following comments on the draft EIS for the Red Mountain Wilderness Studay Area are submitted as my personal views.

When I received a copy of the dEIS I thought at first glance that is was a "summary". But - it turned out to be the whole document! Red Mountain really deserved better. It is regrettable that the BLM fell short in its treatment of the area and its responsibilities to the public - since this WSA has been a major issue with the scientific community and conservation groups for many years.

In any event, I support wilderness designation (Alt. 1) for the entire 6,173 acres in the Red Mountain WSA.

Like the majority of wilderness supporters at the public hearing in Redway on October 12, I, too, thought the dEIS was not only inadequate, but that it leaned heavily toward facilitating speculative mining operations.

A The dEIS acknowledges "unusual" red soils, rare and endangered plants and animals, an anadromous fishery stream and important watershed resources, but then attempts to work around full protection of the issues by references to mineral extraction as the over-riding area of importance. My feeling is that any strategic or critical metals should be left in the ground until there is an absolute, proven necessity to remove them. An existing roadless area should not have to be sacrificed prematurely.

I respectfully urge the BLM to discard the current dEIS and produce an in-depth, thoroughly researched document so the public can address the issue of wilderness, rather than a way to allow for mineral extraction.

Thank you for considering my views.

Sincerely,

Lucille Vinyard

(Mrs.) Lucille Vinyard

RESPONSE TO COMMENT LETTER 24

A. It is now BLM's opinion that because of the Endangered Species Act, there will be no mining in the Red Mountain area in the foreseeable future. See the Appendix.

COMMENT LETTER 25

Ms.Jane Wilson
Box 22
Piercy, Ca. 95467
10/22/83

Bureau of Land Management
Box 940
Ukiah, Ca. 95482

Greetings:

We were so sorry about your conclusions about Red Mountain Wilderness. There are such excellent reasons for the protection of Red Mountain and any status which can be changed at the whim of the existing 4-year administration does not protect it enough from exploitation. You even made a very strong point that it should be preserved for scientific study. And now it has come to light that this is also an important area for Native Americans. It may be of importance archaeologically as well as geologically.. And it is ridiculous to say that any area that unique in soil, wildlife and plantlife with endangered species living there to boot, which is that remote and inaccessible except with alot of trouble does not have exceptional recreational possiblities for the type of person who goes to a wilderness area.

A

Your argument about the adjacent private land being mined is ridiculous since it won't be mined unless the wilderness area of Red Mountain can also be mined. There would not be enough profit in strip mining only the private lands. Mining the whole area would be disastrous to the area, both financially and esthetically. But of course that does not concern the Bureau of Land Management.

B

However, the things which do concern you all point to the status of wilderness for Red Mountain Wilderness. Thank you for listening to our opinions as to what you as custodians should do with the land that is ours.

With Sincerity and Love,

Jane Wilson

RESPONSE TO COMMENT LETTER 25

A. Red Mountain falls within the hinterlands used primarily by the Eel River Wailaki. Although prehistoric activity has doubtless left some traces, a search of available literature has not indicated that any sites of recorded archaeological or sociocultural value fall within the WSA. If any evidence of such values is available, BLM would greatly appreciate a copy of the data so as to better assess and manage those values. To date, none of the Native American groups sent copies of the draft EIS have commented.

It is appropriate to defer formal consultation until there is a proposal to implement a management action that, in BLM's judgment, may affect cultural values.

B. We are not sure what statement you refer to, but our current opinion is that mining will not occur on either public or private land in the Red Mountain area. See the Appendix.

COMMENT LETTER 26

November 25, 1983

The Bureau of Land Management
Ukiah District Office
555 Leslie Street
Ukiah
California 95482

Douglas Zimmerman
P.O. Box 964
Laytonville
California 95454

Comments on Environmental Impact Statement
RED MOUNTAIN WILDERNESS STUDY AREA (WSA),

I live and own property located approximately five miles from the Red Mountain WSA. I have studied the draft EIS prepared for this area, and I believe that the analysis of possible mining operations is inadequate. The draft EIS did not provide objective data showing that possible mining operations would, or would not, effect the wilderness character of this area.

The draft EIS does analyze and describe the ecological and scientific values of the WSA. This data adequately supports the wilderness designation. However, BLM does not recommend a wilderness designation because they assume that it is not possible "to ensure long-term preservation of wilderness values" if mining is to occur. No data is presented to justify this conclusion.

The draft EIS is also confusing and contradictory as it relates to the conflict between possible mining operations and the long-term preservation of wilderness qualities. The draft EIS presents opinions that the long-term protection of the WSA is both possible and not possible.
On pages 2-4, 2-9, and 4-1 the draft EIS states that there can be no assurance that the WSA can be effectively managed to preserve its wilderness character in the long-term.
Then contradicting itself, the draft EIS states the following:
Page 4-1, "any exercise of mineral development rights would under all alternatives, be subject to regulation that prohibits 'unnecessary or undue degradation'"; Page 4-4, "wilderness designation would, however, very likely add to the environmental protection stipulations required..."; Page 4-5, "Wilderness designation assumes that wilderness values will be protected subject to valid existing rights."

A

If BLM insists that possible future mining operations precludes the wilderness designation for the Red Mountain WSA, then the Final EIS must project environmental impact data based upon reasonable models of such mining operations. This is the only objective means by which BLM and the concerned public can attempt to predict the long-term environmental effects of future mining operations.

Thank you for the opportunity to comment on the Draft EIS.

Sincerely,

Douglas Zimmerman

RESPONSE TO COMMENT LETTER 26

A. Wilderness designation protects wilderness values, subject to valid existing rights. Mining is regulated to prevent undue and unnecessary degradation of the Federal lands (see Glossary). This does not mean that destruction of wilderness values is inherently undue or unnecessary; if a normal mining operation must destroy wilderness values the operation may proceed. An EIS addressing the potential mining impacts would be prepared at the time a mining plan of operations were submitted. However, it is now BLM's judgment (see Appendix) that mineral development will not take place at Red Mountain under either alternative.

COMMENT LETTER 27

United States Department of the Interior

NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

DEPT. OF THE INTERIOR

L7619(WR-RP)

March 27, 1988

Memorandum

To: District Manager, Bureau of Land Management, Ukiah, California

From: ACTING Regional Director, Western Region

Subject: Review of Draft Environmental Statement for Preliminary Wilderness Recommendations for the Clear Lake Resource Area (DES-82/41), the Red Mountain Wilderness Study Area (DES-83/57), and the North Central California Wilderness Study Area (DES-83/20)

We have been requested to review the subject environmental statements. Most of our concerns deal with cultural resources in each case. However, we note that the Rocky Creek-Cache Creek WSA in the Clear Lake Resource Area contains a segment of Cache Creek included in the Nationwide Rivers Inventory; and that the Red Mountain WSA contains a tributary to the South Fork Eel River, a componert of the Federal and State Wild and Scenic River Systems. We, therefore, suppor' the management directions that would protect these important stream resources.

The following comments pertain to cultural resources in each of the documents:

Clear Lake Resource Area

The statement does not mention cultural resource legislative mandates, the Section 106 Compliance Process or planning consultation with the State Historic Preservation Officer. Page 5-8 does indicate "existing regulations apply" to cultural resources but these are not defined. Page 4-2 of the statement notes that no survey has been undertaken for the Cedar Roughs WSA but that "it has low predicted sensitivity." Upon what is this conclusion based? The statement indicates also that very little survey work has been done for the Rocky Creek Cache Creek WSA because of "rugged terrain" and follows this reasoning with a conclusion of "no impact." Low sensitivity due to rugged terrain does not preclude sample survey of more likely areas and/or compliance with E.O. 11593. Rugged terrain can produce National

Register sites, even though not numerous (i.e., this type of terrain can still contain springs and seeps which were frequent campsites; quarries and other specialized task sites are also known to occur). Finally, a wilderness (or no action) designation does not negate an agency's cultural resources responsibilities under Federal law.

North Central California Wilderness Study Area

This statement also is deficient in the treatment of prehistoric and historic cultural resources. References are made to "existing laws and regulations" (i.e., page 2-13 and page 4-8), but no official citations or synopses of the laws are given. No reference is made to Section 106 compliance nor compliance with the California State Historic Preservation Office (there is not, in fact, any indication the SHPO was provided with a copy of the draft document for review/comment). Consultation with a State Historic Preservation Office is important for planning/managing cultural properties, and conducting inventories, as well as the legally mandated consultation when significant properties may be impacted or destroyed during a Federal undertaking.

Page 2-18: A "no effect" conclusion is reached because there is "no indication of significant cultural resources in this area." Yet there is no indication the referenced area was ever surveyed. It should also be stressed that a No Action Alternative does not automatically convey No Effect; nor does it absolve an agency from its legally mandated cultural resources responsibilities.

Page 3-3: What is meant by an "intuitive survey of approximately 15-20% of the area (Friedman 1977)"? What is the methodology of an intuitive survey? We would appreciate a copy of this report for further cultural resources evaluation.

Page 4-14: Low sensitivity does not mean there are no significant sites eligible for nomination to the National Register of Historic Places. Significant sites may not be plentiful in poor terrain but they do occur. In this case, how was the low sensitivity conclusion determined?

Red Mountain Wilderness Study Area

A This statement fails to mention the term "cultural resources" along with discussion of legislative mandates, the compliance procedure, consultation with the SHPO, etc. Cultural resources appear not to exist as a requirement that needs addressing.

3

We appreciate the opportunity to review these documents. Since the preceding comments deal with problems in the treatment of cultural resources, our staff contact for questions and further information is Holly Dunbar, Acting Chief, Interagency Archeological Services Branch, who can be reached at telephone number (FTS) 556-5190.

W. Russell White

cc:
WASO-762
Pat Port, REO
IAS, WRO

RESPONSE TO COMMENT LETTER 27

A. In this document, the Final EIS, cultural resources are mentioned as an issue considered, but dropped from further analysis (see page 1-6). Also see the Response to Comment A of Letter 25.

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GLOSSARY

AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC): Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.

CONTIGUOUS: Lands or legal subdivisions having a common boundary; lands having only a common corner are not contiguous.

FLPMA: The Federal Land Policy and Management Act of 1976 (Public Law 94-579, 90 Stat. 2743.43 USC 1701).

IMPACT: To diminish in value or excellence.

MANAGEMENT FRAMEWORK PLAN (MFP): The Bureau's basic planning decision document prior to the adoption of a new planning process in 1979, in which the decision document is a Resource Management Plan (RMP).

MINERAL ENTRY: The right to enter the Public Lands (under the administration of the BLM) to search for minerals and to claim or lease such minerals under the mining and mineral leasing laws and regulations.

MOTORIZED EQUIPMENT: Any machine activated by nonliving power source except small battery-powered, handcarried devices such as flashlights, shavers, Geiger counters, and cameras. Also "Mechanized Equipment."

MOTOR VEHICLE: Any vehicle which is self-propelled or any vehicle which is propelled by electric power obtained from batteries.

MULTIPLE RESOURCE VALUES AND USES: The present and potential use of the various resources administered through multiple use management on the public lands and any public values associated with such uses.

MULTIPLE USE: ". . . the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some lands for less than all of the resources; a combination of balanced and diverse resource uses that take into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural, scenic, scientific, and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." (From Section 103, FLPMA.)

NATURALNESS: Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From Section 2(c), Wilderness Act.)

OFF-ROAD VEHICLE (ORV): Any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other terrain.

OUTSTANDING: 1. Standing out among others of its kind; conspicuous; prominent. 2. Superior to others of its kind; distinguished; excellent.

PLANNING AREA: The area for which resources management plans are prepared and maintained. In most instances, it is the same as the resource area, which is a geographic portion of a BLM district, under supervision of an area manager.

PLANNING CRITERIA: The factors used to guide development of the resource management plan, or revision, to ensure that it is tailored to the issues previously identified and to ensure that unnecessary data collection and analyses are avoided. Planning criteria are developed to guide the collection and use of inventory data and information, the analysis of the management situation, the design and formulation of alternatives, the estimation of the effects of alternatives, the evaluation of alternatives, and the selection of the preferred alternative.

POPULATION CENTER: A Standard Metropolitan Statistical Area (SMSA) which has a population of 100,000 or greater. An SMSA is a county which contains at least one city of 50,000 inhabitants or more, plus as many adjacent counties as are metropolitan in character and are socially integrated with the central city or cities.

PRE-FLPMA: Before October 21, 1976, the date of approval of the Federal Land Policy and Management Act.

PRELIMINARY WILDERNESS RECOMMENDATION: Refers to a wilderness recommendation at any stage prior to the time when the Secretary of the Interior reports his recommendation to the President. Until the Secretary acts, the recommendation is "preliminary" because it is subject to change during administrative review.

PRIMITIVE AND UNCONFINED RECREATION: Nonmotorized and undeveloped types of outdoor recreation activities.

PUBLIC LANDS: For the purpose of the wilderness review program, any lands and interest in lands owned by the United States within the several States and administered by the Secretary of the Interior through the Bureau of Land Management, without regard to how the United States acquire ownership, except:

1. Lands where the United States owns the minerals, but surface is privately owned.

2. Lands being held for the benefit of Indians, Aleuts, and Eskimos.

3. Lands tentatively approved for State selection in Alaska.

4. Lands on the Outer Continental Shelf.

5. Oregon and California grant (O & C) lands that are managed for commercial timber production.

RESOURCE MANAGEMENT PLAN (RMP): The basic decision document of BLM's resource management planning process, used to establish allocation and coordination among uses for the various resources within a Resource Area. An RMP is a "land-use plan" prescribed by Section 202 of the Federal Land Policy and Management Act. RMP regulations appear in 43 CFR 1601. (Refer to definition of Management Framework Plan.)

SMSA: Standard Metropolitan Statistical Area - See definition under "Population Center."

SOLITUDE: 1. The state of being alone or remote from habitations; isolation. 2. A lonely, unfrequented, or secluded place.

SUBSTANTIALLY UNNOTICEABLE: Refers to something that either is so insignificant as to be only a very minor feature of the overall area or is not distinctly recognizable by the average visitor as being man-made or man-caused because of age, weathering, or biological change. An example of the first would be a few minor dams or abandoned mine buildings that are widely scattered over a large area, so that they are an inconspicuous part of the scene. Serious intrusions of this kind, or many of them, may preclude inclusion of the land in a wilderness study area. An example of the second would be an old juniper control project that has grown up to a natural appearance, the old fallen trees largely decomposed.

SUITABILITY: As used in the Wilderness Act and in the Federal Land Policy and Management Act, refers to a recommendation by the Secretary of the Interior or the Secretary of Agriculture that certain Federal lands satisfy the definition of wilderness in the Wilderness Act and have been found appropriate for designation as wilderness on the basis of an analysis of the existing and potential uses of the land.

WILDERNESS: The definition contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891).

WILDERNESS AREA: An area formally designated by an Act of Congress as part of the National Wilderness Preservation System.

WILDERNESS CHARACTERISTICS: The definition contained in Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891).

WILDERNESS INVENTORY: An evaluation of the public lands in the form of a written description and map showing those lands that meet the wilderness criteria as established under Section 603(a) of FLPMA and Section 2(c) of the Wilderness Act, which will be referred to as Wilderness Study Areas (WSAs).

WILDERNESS MANAGEMENT: The management of human use and influence on lands which have been designated by an Act of Congress as wilderness areas.

WILDERNESS PROGRAM: Term used to describe all wilderness activities of the Bureau of Land Management including identification, management, and administrative functions.

WILDERNESS RECOMMENDATIONS: A recommendation by the Bureau of Land Management, the Secretary of the Interior, or the President, with respect to an area's suitability or nonsuitability for preservation as wilderness.

WILDERNESS REPORTING: The process of preparing the reports containing wilderness recommendations on wilderness study areas and transmitting those reports to the Secretary of the Interior, the President, and Congress.

WILDERNESS REVIEW: The term used to cover the entire wilderness inventory study and reporting phases of the wilderness program of the Bureau of Land Management.

WILDERNESS STUDY: The process that specifies how each wilderness study area must be studied through the BLM resource management planning system, analyzing all resources, values and uses within the WSA to determine whether the area will be recommended as suitable or nonsuitable for wilderness designation.

WILDERNESS STUDY AREA (WSA): A roadless area or island that has been inventories and found to have wilderness characteristics as described in Section 603 of FLPMA and Section 2(c) of the Wilderness Act of 1964 (78 Stat. 891).

WILDLIFE IMPROVEMENTS: Any structural or nonstructural improvements which directly affect or support the use of water, food, or shelter by wildlife, such a guzzlers, water lines, or fences.

REFERENCES

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Appendix

APPENDIX

MINING AND THE ENDANGERED SPECIES ACT

This environmental impact statement assumes that no mining will take place in the WSA under either alternative. This assumption is based upon the presence of McDonald's rock-cress (a federally listed endangered plant species), the type of mining that may be expected to occur, and the probable application of the Endangered Species Act of 1973, as amended.

McDonald's rock-cress (Arabis mcdonaldiana Eastwood) was listed as an endangered species on September 28, 1978 (43 Federal Register 44810). The plant species is known only from Red Mountain, Mendocino County, where it occurs on both public and private lands. A recently completed three-year study of the distribution and ecology of the species found that about 80 percent of the known population density of McDonald's rock-cress lies within an approximately two-square-mile area of public lands on the western and southern portions of Red Mountain (Baad 1987). The remaining 20 percent is on adjacent private land. The species is restricted to soils currently classified as belonging to the Hiltabidel Series, where it is found at 20 localities. Densities of the species at these localities range from a few plants to several hundred (Baad 1987).

The soils on which McDonald's rock-cress occurs have high concentrations of nickel and chromium. Nickel concentrations, for example, may exceed 2 percent nickel oxide (Jenny 1977). Because of the presence of these minerals in the soils of Red Mountain, unpatented mining claims have been field on the public lands there. The presence of these claims would make future mining on Red Mountain seem possible. However, because of the effects such mining would have on McDonald's rock-cress, it is unlikely the BLM could ever approve a mining plan of operations for Red Mountain.

Because the minerals are concentrated in the soil mantle, any mining would necessarily involve an open-pit, surface mining operation. Such surface mining activity would entail substantial surface disturbance, including destruction of all vegetation present in the immediate area of the operation and acceleration of erosion from the increasing availability of easily erodible soil and small particles of rock (see FWS 1984 for further discussion of the potential impacts of mining on McDonald's rock-cress). Bureau of Land Management regulations (43 CFR 4802 will apply to Red Mountain as long as it remains a wilderness study area; following designation as wilderness or a decision by Congress to exclude it from the wilderness system the regulations at 43 CFR 4809 will apply) require submission of a plan of operations for any significant mining activity such as would be proposed to mine nickel or chromium at Red Mountain. Prior to approving any plan of operations that may affect a federally listed endangered or threatened species, the Bureau must formally consult with the U.S. Fish and Wildlife Service (FWS) pursuant to Section 7 of the Endangered Species Act of 1973, as amended (see attached memoranda to and from the Fish and Wildlife Service). If FWS finds that the operation will threaten the continued existence of the listed species and that there are no reasonable and prudent alternatives available to avoid jeopardy, the Bureau must reject the plan of operations (see FWS 1984 for further elaboration on the ramifications of the Endangered Species Act vis-à-vis the U.S. Mining Laws).

Based upon our knowledge of the distribution and ecology of McDonald's rock-cress and the extent of any surface mining operation which would reasonably be expected to take place on Red Mountain, we have concluded that no plan of operations could be approved for mining on Red Mountain. The FWS Sacramento Endangered Species Office agrees with this assessment (Bartel, personal communication 1987). Baad (1987) states that McDonald's rock-cress "cannot be expected to coexist with an open-pit mining operation, and it is strongly recommended that the U.S. Fish and Wildlife Service classify the entirety of the upper slopes of Red Mountain as critical species habitat to ensure the continued existence of Arabis mcdonaldiana." (Designation of Critical Habitat is not required to protect the species under the Endangered Species Act; the mere listing of the species is sufficient.)

For the reasons given above, this environmental impact statement assumes mining will not occur under either alternative. While it remains possible that mining could occur, this possibility is considered remote. It is therefore unreasonable to analyze any alternatives under which mining would occur.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

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MEMORANDUM

TO: Mr. Ed Hastey, State Director, Bureau of Land Management, California State Office, 2800 Cottage Way Sacramento, California 95825

FROM: Project Leader, Endangered Species Office, Sacramento, California 95825

SUBJECT: Consultation requirements for BLM Wilderness Designation 8500 (CA-930.1) (Case No. 1-1-86-I-321)

In response to your May 6, 1986, request for informal consultation regarding designation or non-designation of wilderness status for Wilderness Study Areas (WSA's), we concur with your statement that this process does not require formal Section 7 consultation. Any future actions on WSA's that might affect a listed species can be evaluated at proposal stage and formal consultations initiated if needed.

If you have questions regarding this reply please contact me at FTS/460-4866.

Gail C. Kobetich

cc: Chief, Endangered Species, Portland, OR 97232 (AFA-SE)

IN REPLY REFER TO:

8500
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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA STATE OFFICE
2800 Cottage Way
Sacramento, California 95825

MAY 6 1986

Mr. Gail Kobetich, Project Leader
U.S. Fish and Wildlife Service
Sacramento Endangered Species Office
2800 Cottage Way
Sacramento, CA 95825

Dear Mr. Kobetich:

The U.S. Bureau of Land Management in California is preparing eleven final Wilderness EIS's during fiscal year 1986 that will analyze the environmental impacts of wilderness designation or non-designation on a total of 58 Wilderness Study Areas (WSA's). We hereby initiate informal consultation pursuant to Section 7 of the Endangered Species Act concerning this matter.

Some of these WSA's provide important habitat for federally listed or proposed endangered species (for example, Peregrine Falcons and Bald Eagles). It has been determined by the BLM that the designation or non-designation of these areas as wilderness by Congress (at the recommendation of the BLM) will have only incidental benefit to any threatened or endangered species involved, not significant positive or negative effects.

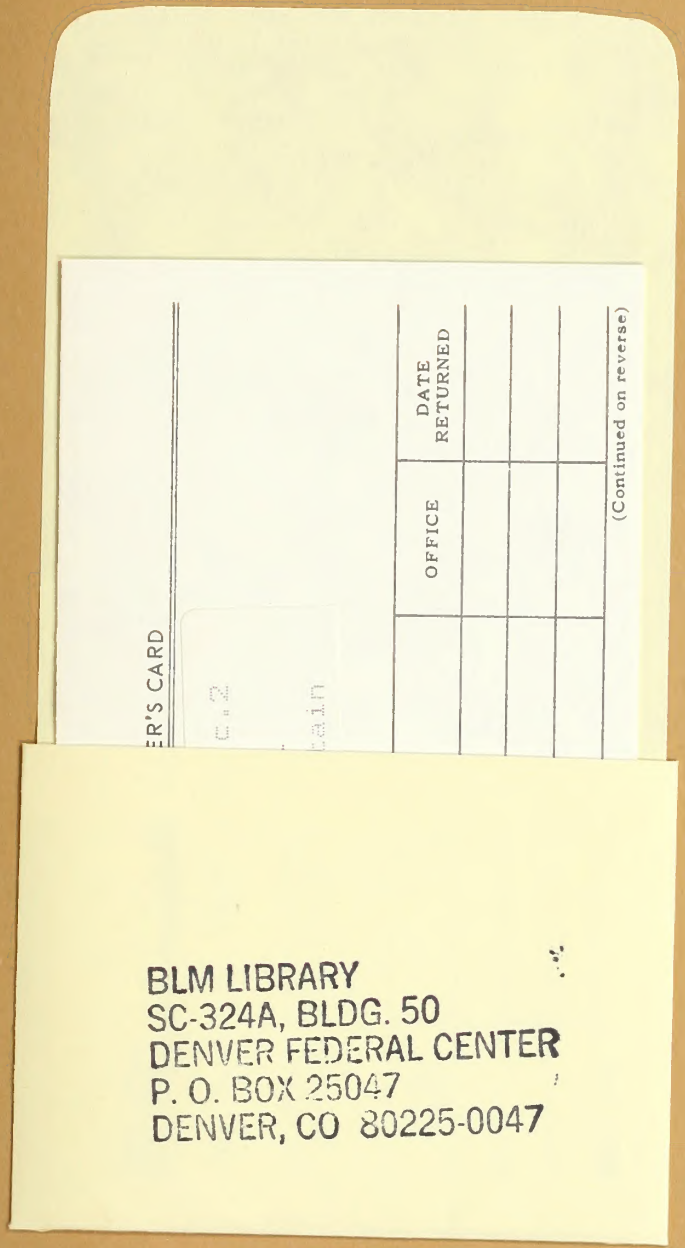
We seek your concurrence that these wilderness designations or non-designations do not themselves require formal Section 7 consultation, but that such consultation must be initiated prior to on-the-ground implementation of activities which may affect threatened or endangered species under wilderness or non-wilderness designations.

Your prompt reply will be greatly appreciated.

Sincerely,

Ed Hastey
State Director

GPO 586-075/99013



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